

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

	X	
	:	
In re:	:	Chapter 11
	:	
BRICKCHURCH ENTERPRISES, INC.,	:	Case No. 8-22-70914-ast
	:	
	:	Response Deadline: December 12, 2022
Debtor.	:	
	:	
	X	

**NOTICE OF FIRST FEE APPLICATION OF SIMMONS LEGAL PLLC FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD JUNE 21, 2022 THROUGH NOVEMBER 20, 2022**

PLEASE TAKE NOTICE that the following application was filed on **Monday,**
November 21, 2022:

- First Fee Application of Simmons Legal PLLC for Allowance of Compensation and Reimbursement of Expenses for the Period June 21, 2022 Through November 20, 2022 (the “*Application*”).

PLEASE TAKE FURTHER NOTICE THAT RESPONSES OR OBJECTIONS, IF ANY, TO THE APPLICATION MUST BE IN WRITING AND FILED WITH THE BANKRUPTCY COURT AND SERVED UPON THE UNDERSIGNED COUNSEL FOR DEBTOR SO AS TO BE RECEIVED BY **DECEMBER 12, 2022** (the “**RESPONSE DEADLINE**”).

PLEASE TAKE FURTHER NOTICE THAT NO HEARING REGARDING THE APPLICATION WILL BE CONDUCTED UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT BY THE RESPONSE DEADLINE.

PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSE IS RECEIVED BY THE RESPONSE DEADLINE, AND NO HEARING IS TIMELY REQUESTED, THE RELIEF REQUESTED IN THE APPLICATION SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

Dated: November 21, 2022

Respectfully submitted,

SIMMONS LEGAL PLLC

/s/ Camisha L. Simmons

Camisha L. Simmons

SIMMONS LEGAL PLLC

1330 Avenue of the Americas, Suite 23A

New York, New York 10019

212.653.0667 (Telephone- New York)

214.643.6192 (Telephone- Dallas)

800.698.9913 (Facsimile)

Email: camisha@simmonslegal.solutions

COUNSEL FOR DEBTOR

**IN UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

	X	
	:	
In re:	:	Chapter 11
	:	
BRICKCHURCH ENTERPRISES, INC.,	:	Case No. 22-70914-ast
	:	
	:	
Debtor.	:	
	:	
	X	

**FIRST FEE APPLICATION OF SIMMONS LEGAL PLLC FOR ALLOWANCE
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD JUNE 21, 2022 THROUGH NOVEMBER 20, 2022**

Name of Applicant: Simmons Legal PLLC

Authorized to Provide Professional Services to: Debtor and Debtor in Possession

Date of Retention: June 21, 2022

Period for Which Compensation and Reimbursement is Sought: June 21, 2022 through November 20, 2022

Amount of Compensation Sought as Actual, Reasonable and Necessary: \$102,532.50

Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: \$4,085.45

**NAME AND HOURLY RATE OF EACH BILLING PROFESSIONAL AND/OR
PARAPROFESSIONAL FOR FIRST APPLICATION PERIOD**

<u>Name</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Camisha L. Simmons	Principal/Managing Member	525	199.4	\$102,532.50
	Total:		199.4	\$102,532.50

This is a(n): _____ monthly x interim _____ final application

Simmons Legal has continued to guide the Debtor through its chapter 11 process. In 5 months, Simmons Legal assisted the Debtor in achieving successful dispute resolution with its primary prepetition secured lender, approval of financing and preparation of financing documents and pleadings, engagement of a broker to market the Debtor's primary asset for sale and rental, and formulation of a proposed plan of reorganization and disclosure statement in an effort to achieve a successful reorganization. Among other things, Simmons Legal assisted the Debtor in accomplishing the following: (i) addressing and litigating creditor claims, disputes, stay relief and dismissal litigation, and lien issues; (ii) obtaining post-petition financing on reasonable terms to assist in funding the Debtor's reorganization; and (iii) retention of various estate professionals to help the Debtor achieve a sale of its primary asset and a successful resolution of claims, including a global settlement with the Debtor's prepetition secured lender.

Simmons Legal believes that the hours expended, and expenses associated with the services rendered in accomplishing these above successes were reasonable and necessary. The Debtor's principal has been provided the opportunity to review the requested fees and expenses and has not objected to the requested amount. Accordingly, Simmons Legal requests that the Court approve Simmons Legal's request for payment of its fees and expenses incurred during this chapter 11 case.

JURISDICTION

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016 and Local Rule 2016-1.

BACKGROUND

4. On April 30, 2022 (the “***Petition Date***”), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

5. The Debtor remains in possession of its assets and continues to operate and manage its business as debtor in possession pursuant to Bankruptcy Code sections 1107 and 1108. No trustee or examiner has been appointed.

6. All quarterly fees have been paid to the United States Trustee and monthly operating reports have been filed. All cash on hand, expenses and disbursements are detailed in the monthly operating reports on file with the Court.

7. By order dated July 12, 2022, Simmons Legal was retained as counsel for the Debtor (the “***Retention Order***”) [Dkt. No. 49], attached hereto as **Exhibit A**.

8. On September 30, 2022, the Debtor filed the Debtor’s Plan of Reorganization Under Chapter 11 of the Bankruptcy Code (“***Plan***”) and the related disclosure statement (“***Disclosure Statement***”) [Dkt. Nos. 116 and 117, respectively].

9. The Debtor plans to file an amended plan and related disclosure statement with the Court to reflect various negotiations, compromises and agreements with certain parties in interest regarding approved DIP financing and a global settlement with Debtor’s prepetition secured lender. The Debtor is also actively pursuing a sale of its primary asset, a luxury residential oceanfront estate in Southampton.

RELIEF REQUESTED

10. By this Application, Simmons Legal seeks entry of an order, substantially in the form attached hereto as **Exhibit B**, approving: (a) allowance of compensation for professional services rendered by Simmons Legal, as counsel for the Debtor, for the Compensation Period in the amount of \$102,532.50, representing 199.4 hours of professional services; and

(b) reimbursement of actual and necessary costs and expenses incurred by Simmons Legal during the Compensation Period in the amount of \$4,085.45.

11. A detailed itemization of the services performed and time spent and the actual, out-of-pocket costs and expenses incurred by Simmons Legal in connection with its representation of the Debtor during the Compensation Period is provided in the time and disbursement records annexed hereto as **Exhibit C**. Such records are made contemporaneously with the rendition of services by the person rendering such services and in the ordinary course of Simmons Legal's billing practices.

12. The costs and expenses have been incurred in accordance with Simmons Legal's customary practice of charging clients for those expenses clearly related to and required by particular matters, rather than including such charges as part of Simmons Legal's hourly rates.

13. All services performed and expenses incurred by Simmons Legal for which compensation or reimbursement is requested herein were performed or incurred for and on behalf of the Debtor, and were not for any other person or entity.

SUMMARY DESCRIPTION OF SERVICES PERFORMED

14. During the course of this chapter 11 case, Simmons Legal performed, among others, the following services:

- Advised the Debtor with respect to its rights, powers and duties as debtor and debtor in possession in the continued management and operation of its business and assets;
- Attended meetings and communicated and negotiated with parties in interest and advising and consulting on the conduct of the case, including all of the legal and administrative requirements of operating in chapter 11;
- Took all necessary action to protect and preserve the Debtor's estate, including litigation of actions on the Debtor's behalf, the defense of any actions commenced against the estate, negotiations concerning litigation in which the

Debtor may be involved and research and analysis regarding objections to claims filed against the estate;

- Prepared, on behalf of the Debtor, motions, applications, answers, orders, reports, discovery requests and responses and other papers necessary to the administration of the estate;
- Prepared the Debtor's plan of reorganization, disclosure statement, and all related agreements and/or documents;
- Participation and negotiation and drafting all documents and pleadings related to the Debtor's post-petition financing;
- Advised the Debtor in connection with the sale of its primary asset and taking all steps necessary to ensure the Debtor is in position to maximize the value of the Debtor's primary asset;
- Performed other necessary legal services and provided other necessary legal advice to the Debtor in connection with this chapter 11 case; and
- Appeared before this Court and the United States Trustee, and protected the interests of the Debtor's estate before the Court and the United States Trustee.

15. Since the Petition Date, Simmons has worked with the Debtor's prepetition secured creditor, the office of the United States Trustee, and other significant parties in interest, to efficiently and effectively administer the Debtor's chapter 11 case. Simmons Legal also represented the Debtor in defending a motion to dismiss and stay relief challenges. Ultimately, the Debtor, with the assistance of Simmons Legal obtained approval of postpetition financing, formulated a plan of reorganization and disclosure statement, engaged a broker that is actively working on a sale of the Debtor's real property and successfully defended and pursued litigation favorable to the Debtor.

16. Services rendered by Simmons Legal during the Compensation Period have been grouped into project categories (each a "***Project Category***"). Time entries and expenses for each Project Category during the Compensation Period are set forth in **Exhibit C**. Below is a general

non-exhaustive description of each Project Category to which time was billed during the Compensation Period.

Asset Disposition/Sales/Leases/Rentals

- This Project Category includes time billed by Simmons Legal professionals in working on matters related to the Debtor's efforts related to the marketing for sale and rental of its primary real estate.

Bankruptcy Case Administration

- This Project Category includes time billed by Simmons Legal professionals in working on matters related to U.S. Trustee inquiries and monthly operating reports and statement, contacts with the U.S. Trustee, general case administration and general creditor inquiries. This Project Category may also include services rendered in providing general assistance and advice to the Debtor related to debtor-in-possession activities and operations in chapter 11, the effect of the bankruptcy proceedings and application of bankruptcy law on the Debtor's operations, cash management, the rights and objections of debtor in possession, and interpretation of orders.

Business Operations

- This Project Category includes time billed by Simmons Legal professionals in working on matters related to operations including depositing of funds received and general matters related to operating the Debtor. This Project Category also includes general assistance and advice to the Debtor related to debtor-in-possession business operations in chapter 11, the effect of the bankruptcy proceedings on the Debtor's business operations, cash management, the rights and objections of debtor in possession, and interpretation of orders.

Claims Administration and Objections

- This Project Category includes time billed by Simmons Legal professionals in working on matters related to specific claim inquiries; and research and analyses regarding objections and allowances of claims.

Fee/Employment Applications

- This Project Category includes time billed by Simmons Legal with respect to addressing any and all matters related to preparing conflicts checklists, reviewing conflicts reports, and drafting applications to retain various professionals. This Project Category also includes all matters related to billing issues and preparation of applications for allowance of compensation and reimbursement of expenses.

Financing

- This Project Category includes time billed by Simmons Legal professionals related to matters arising under Bankruptcy Code sections 361, 363 and 364, including cash collateral, DIP financing, and secured claims and loan document drafting and negotiation.

Litigation

- This Project Category includes time billed by Simmons Legal professionals with respect to various tasks related to research, analysis and strategy regarding the Debtor's pending appeal in state court and various potential litigation matters in this chapter 11 case.

Litigation-Motion to Dismiss

- This Project Category includes time billed by Simmons Legal professionals with respect to various tasks related to defending the Debtor against the motion to dismiss litigation commenced by the Debtor's prepetition secured lender.

Relief from Stay Proceedings

- This Project Category includes time billed by Simmons Legal professionals with respect to various tasks related to defending the Debtor against the stay relief litigation commenced by the Debtor's prepetition secured lender.

Plan and Disclosure Statement

- This Project Category includes time billed by Simmons Legal professionals in matters related to formulation, drafting and presentation of the plan and disclosure statement.

17. Simmons Legal respectfully submits that the professional services rendered by it for and on behalf of the Debtor were necessary and have contributed to the effective administration of the Debtor's case.

18. Simmons Legal respectfully submits that the services rendered, as set forth below, and expenses incurred for the Compensation Period for which Simmons Legal seeks compensation and reimbursement are reasonable.

- (a) Time and labor required: Simmons Legal expended hours of professional time on behalf of the Debtor during the Compensation Period. The services required by the Debtor during this case imposed significant time demands upon Simmons Legal's attorney and often necessitated work beyond normal business hours.

- (b) Novelty and difficulty of questions and matters resolved: This case and the legal issues presented therein have required a high level of professional skill and expertise.
- (c) Fees charged and fees awarded in similar cases: The fees sought by Simmons Legal in this Application are commensurate with fees awarded in other cases and the fees charges by comparable law firms.
- (d) Time limitations: This case has required Simmons Legal to perform a vast variety of services and address numerous different issues on behalf of the Debtor, often under significant time constraints.
- (e) Whether the fee is fixed or contingent: All fees sought by professionals under sections 330 and 331 of the Bankruptcy Code are contingent prior to approval by the Bankruptcy Court.
- (f) The “undesirability” of the case: Representation of the Debtor in this case is not undesirable. As noted above, however, Simmons Legal’s representation of the Debtor in this case has required a significant commitment of time and effort.
- (g) The results obtained: Simmons Legal respectfully submits that matters on this case have been or are in the process of being successfully resolved by obtaining financing and subsequent confirmation of a favorable plan and implementing the transactions contemplated therein.
- (h) The Debtor’s and Simmons Legal’s professional relationship: On or about June 21, 2022, the Debtor selected Simmons Legal to represent the Debtor with respect to the Debtor’s in-court bankruptcy and restructuring.

19. Further, Simmons Legal’s primary attorney performing work in this case has the experience and specialization to perform the services required efficiently and properly. The attorney providing the services for which compensation is sought pursuant to this Application specializes in the fields of bankruptcy, insolvency, corporate finance, and litigation. Moreover, Simmons Legal, as necessary, may use the services of law clerks and legal assistants supervised by attorneys whenever appropriate in order to limit costs and more efficiently utilize the services of attorneys.

20. Finally, in rendering services to and on behalf of the Debtor, Simmons Legal has taken every care to provide the legal services as efficiently as possible and to avoid duplication of services.

21. Simmons Legal has not shared or agreed to share compensation or reimbursement to be awarded in this case with any other person.

Preparation of Application and Requested Fees and Expenses

22. Simmons Legal estimates that over approximately 5 hours were spent preparing this fee application. Simmons Legal is not seeking reimbursement for the time spent preparing the Application.

23. In light of the foregoing, by this Application, Simmons Legal seeks the allowance of the full amount of its fees of \$102,532.50 and expenses of \$4,085.45 for the Compensation Period, application of the \$5000 retainer on file with Simmons Legal, and payment of the unpaid balance (after application of the \$5,000 retainer) of \$97,532.50 in fees and \$4,085.45 in expenses.

NOTICE

24. Notice of the relief requested herein has been served on all parties required to be served pursuant to the local rules and Federal Rules of Bankruptcy Practice and Procedure, including the Office of the United States Trustee and all parties who have filed notices of appearance and requested such notice.

WHEREFORE, Simmons Legal respectfully requests an order:

- (a) approving the final allowance of **\$102,532.50** for compensation for professional services rendered by Simmons Legal during the Compensation Period;

- (b) approving the reimbursement of Simmons Legal's actual, out-of-pocket expenses for the Compensation Period in the amount of **\$4,085.45**;
- (c) authorizing and directing the Debtor to pay Simmons Legal's approved fees and approved expenses for the Compensation Period, less any amount of retainer on file with Simmons Legal;
- (d) and granting such other and further relief as this Court deems just and proper.

Dated: November 21, 2022

Respectfully submitted,

SIMMONS LEGAL PLLC

/s/ Camisha L. Simmons

Camisha L. Simmons

SIMMONS LEGAL PLLC

1330 Avenue of the Americas, Suite 23A

New York, New York 10019

212.653.0667 (Telephone- New York)

214.643.6192 (Telephone- Dallas)

800.698.9913 (Facsimile)

Email: camisha@simmonslegal.solutions

COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, on November 21, 2022, a true and correct copy of the foregoing *First Interim Application of Simmons Legal PLLC for Allowance of Compensation and Reimbursement of Expenses for the Period June 21, 2022 to November 20, 2022* was served electronically upon the counsel and parties of record through the Court's Electronic Case Filing System on those parties that have consented to such service, including the U.S. Trustee, and by email to those parties who have filed a notice of appearance, and by first-class mail on the parties listed on the Debtor's service list.

/s/ Camisha L. Simmons

Camisha L. Simmons

Exhibit A

Simmons Legal Retention Order

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

	X	
	:	
In re:	:	Chapter 11
	:	
BRICKCHURCH ENTERPRISES, INC.,	:	Case No. 8-22-70914-ast
	:	
	:	
Debtor.	:	
	:	
	X	

**ORDER PURSUANT TO SECTIONS 327(a) AND 328 OF THE BANKRUPTCY
CODE, FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014(a), AND LOCAL
BANKRUPTCY RULE 2014-1 FOR AUTHORITY TO RETAIN AND
EMPLOY SIMMONS LEGAL PLLC AS BANKRUPTCY COUNSEL**

Upon consideration of the Application¹ of the Debtor for Entry of an Order Pursuant to Sections 327(a) and 328 of title 11 of the United States Code (the “***Bankruptcy Code***”) and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “***Bankruptcy Rules***”) and Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Eastern District of New York (the “***Local Rules***”) [Dkt. No. 34], approving the retention and employment of Simmons Legal (“***Simmons Legal***”) as debtor-in-possession bankruptcy counsel (“***Bankruptcy Counsel***”) to the Debtor effective as of June 21, 2022, and the *Declaration of Louise Blouin in Support of the Application of Debtor Pursuant to Sections 327(a) and 328 of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2014(a), and Local Bankruptcy Rule 2014-1 for Authority to Retain and Employ Simmons Legal PLLC as Bankruptcy Counsel to Debtor-in-Possession* [Dkt. No. 40] and the *Declaration of Camisha L. Simmons in Support of the Application* [Dkt. No. 39] and the Court being satisfied that Simmons

Legal is disinterested and represents no interest adverse to the Debtor or to its Bankruptcy Estate in the matters upon which Simmons Legal is to be engaged and that Simmons Legal's employment is necessary and would be in the best interests of the Debtor's Bankruptcy Estate, creditors, and other parties in interest; and due and sufficient notice of the Application having been given under the particular circumstances; and it appearing that no other or further notice is required; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Application is GRANTED to the extent articulated in this Order.
2. Pursuant to Bankruptcy Code sections 327(a) and 328, the Debtor, as debtor-in-possession, are authorized to employ and retain Simmons Legal as its Bankruptcy Counsel, effective as of June 21, 2022, in accordance with the Application and this Order, and to perform the services described therein.
3. Simmons Legal shall be compensated in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the United States Trustee Fee Guidelines, and any orders entered in this case governing professional compensation and reimbursement for services rendered and charges and disbursements incurred.

(footnote continued from prior page)

¹ Capitalized terms not defined herein shall have the meanings ascribed thereto in the Application.

4. Only fees and expenses approved and authorized by the Court will be paid to Simmons Legal for compensation due Simmons Legal PLLC pursuant to the Application and this Order.

5. Any additional professionals to be retained that are not employees or members of Simmons Legal PLLC will need to be retained by separate application to the Court in accordance with the Bankruptcy Code, Bankruptcy Rules and Local Rules.

6. With respect to Simmons Legal's services rendered prepetition and its provision of post-petition services, Simmons Legal hereby irrevocably and unconditionally submits to the exclusive jurisdiction of this Court over any suit, action or proceeding arising out of or relating to its representation of the Debtor, or this Order, and over the approval of its request for any fees and expenses (including any requests for indemnification, contribution or reimbursement) accruing through confirmation of a plan of reorganization in this chapter 11 case or, in the event that no plan of reorganization is confirmed in this case, fees and expenses accruing prior to the last date of Simmons Legal's employment pursuant to the Engagement Letter, as modified by this Order. This Court shall retain jurisdiction to construe and enforce the terms of the Application and this Order.

No Objection:

/s/ William J. Birmingham
William J. Birmingham, Esq.
Trial Attorney
Office of the United States Trustee



Dated: July 12, 2022
Central Islip, New York



Alan S. Trust
Chief United States Bankruptcy Judge

Exhibit B

Proposed Form of Order

1409; (3) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (4) notice of the First Fee Application was sufficient under the circumstances, and no objections have been received; (5) the relief sought in the First Fee Application is in the best interests of the Debtor, its creditors, and all parties in interest; and (6) the legal and factual bases set forth in the First Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The First Fee Application is approved, and the fees and expenses requested in the First Fee Application are allowed in the amount of **\$102,532.50** for payment of compensation and **\$4,085.45** for reimbursement for expenses incurred as counsel for the Debtor for the period from June 21, 2022 through November 20, 2022.
2. The Debtor is authorized to pay the balance of Simmons Legal's fees and expenses requested in the First Fee Application in the amount of **\$101,617.95**.
3. This Order shall be immediately effective and enforceable upon its entry, and the Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and enforcement of this Order.

Exhibit C

Time Entries and Itemized Expenses

Simmons Legal PLLC

6060 N. Central Expressway
Suite 500
Dallas, Texas 75206
United States
214-643-6192

Simmons Legal PLLC**Louise Blouin**

Brickchurch Enterprises, Inc.
366 Gin Lane
Southampton, NY 11968

Balance

\$106,617.95

Invoice #

00266

Invoice Date

November 21, 2022

Payment Terms

Due Date

Due Date

December 20, 2022

Brickchurch Enterprises, Inc. Chapter 11 Reorganization (22-0621)

For services rendered between
June 21, 2022 and November 20, 2022

Time Entries

Date	EE	Activity	UTBMS Activity Code	UTBMS Task Code	Description	Rate	Hours	Line Total
06/23/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A108	B160	Call with M. Augustine, counsel to Sotheby's, regarding Sotheby's retention application and request for filing.	\$525.00	0.2	\$105.00
06/23/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A127	L100	Review correspondence and materials forwarded by former bankruptcy counsel regarding case status and developments.	\$525.00	0.3	\$157.50
06/24/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Multiple correspondence with C. Robins, outgoing debtor's counsel, regarding various case matters.	\$525.00	0.7	\$367.50

06/24/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Multiple correspondence with L. Blouin and other members of Debtor team regarding case developments, including recently filed JGB statement.	\$525.00	0.3	\$157.50
06/24/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A104	L250	Review and analyze filed statement of creditor JGB in connection with scheduled June hearing..	\$525.00	0.3	\$157.50
06/25/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A111	L210	Finalize and file Application to Employ Simmons Legal PLLC as Debtor's Counsel (.3) and serve the same to counsel by email (.1).	\$525.00	0.4	\$210.00
06/26/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A106	B160	Correspondence with L. Blouin regarding broker retention application and property information.	\$525.00	0.2	\$105.00
06/27/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Call with M. Augustine, counsel to Sotheby's, regarding status of retention application.	\$525.00	0.3	\$157.50
06/27/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	P400	Multiple correspondence with L. Blouin and M. Kabatoff regarding monthly operating report for May.	\$525.00	0.2	\$105.00
06/27/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Attend to multiple correspondence with L. Blouin and Sotheby's team regarding Sotheby's engagement.	\$525.00	0.3	\$157.50
06/27/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	JM30	Correspondence with A. Willie, law clerk to Judge Trust, regarding June 29 status conference.	\$525.00	0.1	\$52.50

06/27/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	JM30	Correspondence with outgoing debtor's counsel C. Robins regarding June 29 status conference.	\$525.00	0.1	\$52.50
06/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	P400	Multiple correspondence with M. Kabatoff and L. Blouin regarding monthly operating report and supporting documentation.	\$525.00	0.3	\$157.50
06/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A104	L110	Review financial documentation provided by M. Kabatoff.	\$525.00	0.2	\$105.00
06/28/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A104	B160	Review multiple correspondence from L. Blouin and E. Reale at Sotheby's regarding broker agreement changes.	\$525.00	0.3	\$157.50
06/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Multiple correspondence with L. Blouin regarding further background information on case and debtor.	\$525.00	0.4	\$210.00
06/28/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Correspondence with C. Robins regarding draft Sotheby's retention application.	\$525.00	0.1	\$52.50
06/28/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A103	B160	Review, edit and revise Sotheby's retention application, affidavit and proposed order.	\$525.00	0.7	\$367.50
06/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A101	JM30	Review materials in preparation for June 29 status conference.	\$525.00	0.3	\$157.50
06/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L120	Multiple calls with Debtor team to discuss various case matters and next steps.	\$525.00	0.7	\$367.50
06/29/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A109	JM30	Attend and participate in Status Conference before the Court.	\$525.00	1.1	\$577.50

06/29/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A101	JM30	Review materials and communicate with Debtor team in preparation for Status Conference before the Court.	\$525.00	0.5	\$262.50
06/29/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L120	Correspondence with Debtor team regarding recap of Status Conference and next steps.	\$525.00	0.3	\$157.50
06/29/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	B310	Correspondence with Creditor V. Serigano at Schwartz, Sladkus Reich Greenberh Atlas LP regarding asserted claim.	\$525.00	0.1	\$52.50
06/29/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A103	L210	Prepare and file certificate of service for service of monthly operating report on service parties.	\$525.00	0.2	\$105.00
06/30/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Call with W. Birmingham, U.S. Trustee, regarding further information needed from Debtor.	\$525.00	0.6	\$315.00
06/30/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A103	B160	Revise Simmons declaration and draft Louise Blouin declaration in support of Simmons Legal PLLC retention application and circulate to team for review.	\$525.00	0.3	\$157.50
06/30/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with Debtor team regarding amendment to monthly operating report and further information needed by U.S. Trustee, W. Birmingham.	\$525.00	0.2	\$105.00

06/30/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	B110	Correspondence with C. Robins regarding amendment to schedule F and next steps.	\$525.00	0.1	\$52.50
06/30/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Correspondence with L. Blouin and M. Kabatoff regarding draft narrative/support ive background facts.	\$525.00	0.2	\$105.00
07/01/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A106	B160	Correspondence with Debtor team regarding finalizing declarations in support of Simmons retention.	\$525.00	0.1	\$52.50
07/01/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A111	B160	Finalize and file declarations in support of Simmons retention.	\$525.00	0.1	\$52.50
07/01/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Correspondence with W. Birmingham, U.S. Trustee, regarding Simmons retention order and declarations in support.	\$525.00	0.1	\$52.50
07/03/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L120	Multiple correspondence with L. Blouin and M. Kabatoff regarding property information and other information needed for case matters and strategy.	\$525.00	0.5	\$262.50
07/04/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with M. Kabatoff and review of forwarded documents regarding amended monthly operating report accounting/allocation of rent proceedings.	\$525.00	0.2	\$105.00

07/05/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	B110	Multiple correspondence with M. Kabatoff and rest of Debtor team regarding amended monthly operating.	\$525.00	0.2	\$105.00
07/05/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A111	L250	Review and file amended monthly operating and certificate of service.	\$525.00	0.1	\$52.50
07/05/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L250	Correspondence from U.S. Trustee, W. Birmingham, regarding request for rental income and expense accounting (.1); multiple correspondence with M. Kabatoff regarding preparation of rental expense accounting requested by U.S. Trustee (.2).	\$525.00	0.3	\$157.50
07/05/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A104	L250	Review and provide comments to M. Kabatoff regarding rental expense accounting requested by U.S. Trustee.	\$525.00	0.2	\$105.00
07/05/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A106	B160	Multiple correspondence with Debtor team regarding various matters related to broker engagement.	\$525.00	0.4	\$210.00
07/05/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L190	Multiple correspondence with Debtor team regarding property appraisals and property photos.	\$525.00	0.2	\$105.00
07/06/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Follow up correspondence with M. Kabatoff and L. Blouin regarding rental expense accounting requested by U.S. Trustee.	\$525.00	0.2	\$105.00

07/06/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	B130	Review multiple correspondence from L. Blouin to Sotheby's team regarding marketing/listing issues.	\$525.00	0.2	\$105.00
07/06/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L190	Multiple correspondence with M. Kabatoff and L. Blouin regarding accounting of rental income and expenses.	\$525.00	0.2	\$105.00
07/06/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A104	B310	Review proofs of claim (one duplicate) filed by JGB and multiple correspondence with the Debtor team regarding the same.	\$525.00	0.4	\$210.00
07/06/2022	CS	LITIGATION	A102	L120	Confidential research and analysis regarding potential litigation claims in bankruptcy (.4); correspondence with the Debtor team regarding the same (.1).	\$525.00	0.5	\$262.50
07/06/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L250	Circulate accounting of rental income and expenditures to W. Birmingham, U.S. Trustee.	\$525.00	0.1	\$52.50
07/06/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L120	Call with Debtor team regarding preparation of various written submissions to be filed with Court, plan formulation, strategy and next steps (.7); numerous e- correspondence regarding the same (.4).	\$525.00	1.1	\$577.50

07/07/2022	CS	FINANCING	A103	L250	Prepare memorandum to client for refinancing efforts re: Status of Chapter 11 Reorganization Proceedings of Brickchurch Enterprises, Inc. and circulate to L. Blouin and M. Kabatof.	\$525.00	0.7	\$367.50
07/07/2022	CS	BUSINESS OPERATIONS	A106	B200	Correspondence with L. Blouin regarding receipt of check and instructions regarding placement in DIP account.	\$525.00	0.2	\$105.00
07/07/2022	CS	FINANCING	A106	L250	Correspondence with L. Blouin regarding comments to memo for refinancing efforts.	\$525.00	0.2	\$105.00
07/07/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A105	L100	Correspondence with C. Robins regarding amendment to Schedule F and other case matters.	\$525.00	0.1	\$52.50
07/08/2022	CS	LITIGATION	A108	L120	Call with team to discuss and analyze possible litigation causes of action.	\$525.00	0.7	\$367.50
07/10/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with L. Blouin regarding restructuring issues.	\$525.00	0.1	\$52.50
07/11/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A106	B310	Review PSEG proof of claim and correspondence with Debtor team regarding the same.	\$525.00	0.2	\$105.00
07/11/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with M. Blouin and M. Kabatoff regarding various case matters.	\$525.00	0.2	\$105.00

07/11/2022	CS	RELIEF FROM STAY PROCEEDINGS	A104	L210	Review and analyze motions for relief from stay and request for dismissal (1.8); numerous correspondence with Debtor team regarding the same (.4).	\$525.00	2.2	\$1,155.00
07/12/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Correspondence with L. Blouin regarding case background information on prepetition events regarding restructuring.	\$525.00	0.2	\$105.00
07/12/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Call with C. Robins regarding amended schedule F and various case matters.	\$525.00	0.5	\$262.50
07/13/2022	CS	BUSINESS OPERATIONS	A106	B210	Correspondence with L. Blouin and M. Kabatoff regarding insurance reimbursement check received for repairs made.	\$525.00	0.2	\$105.00
07/13/2022	CS	BUSINESS OPERATIONS	A108	B210	Send correspondence to R. Kanowitz, counsel to JGB, regarding required JGB endorsement for deposit of insurance reimbursement check into DIP account for ongoing maintenance repairs at property.	\$525.00	0.1	\$52.50
07/14/2022	CS	BUSINESS OPERATIONS	A108	B210	Multiple correspondence with R. Kanowitz, counsel to JGB regarding insurance reimbursement check and additional information requested by JGB.	\$525.00	0.2	\$105.00

07/14/2022	CS	BUSINESS OPERATIONS	A106	B210	Multiple correspondence with Debtor team regarding insurance reimbursement, JGB information request, broker issues and related property matters.	\$525.00	0.7	\$367.50
07/15/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A103	L100	Prepare list of urgent time sensitive items and tasks list and circulate the same to the Debtor team.	\$525.00	0.3	\$157.50
07/15/2022	CS	BUSINESS OPERATIONS	A106	B210	Numerous correspondence with Debtor team regarding insurance reimbursement and information requested by JGB regarding insurance claim and reimbursement.	\$525.00	0.3	\$157.50
07/15/2022	CS	BUSINESS OPERATIONS	A108	B210	Prepare and send correspondence to R. Kanowitz regarding authorization to deposit insurance reimbursement check and additional information requested by JGB regarding insurance claim and reimbursement.	\$525.00	0.2	\$105.00
07/18/2022	CS	RELIEF FROM STAY PROCEEDINGS	A108	L300	Correspondence with JGB's counsel regarding discovery requests for motions for stay relief and/or dismissal.	\$525.00	0.2	\$105.00
07/18/2022	CS	RELIEF FROM STAY PROCEEDINGS	A104	L300	Review deposition notice and discovery requests submitted by JGB.	\$525.00	0.3	\$157.50

07/18/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L300	Numerous correspondence with Debtor team regarding discovery requests.	\$525.00	0.2	\$105.00
07/18/2022	CS	BUSINESS OPERATIONS	A106	B210	Correspondence with JGB's counsel and Debtor team regarding authorization to deposition insurance reimbursement check.	\$525.00	0.1	\$52.50
07/19/2022	CS	RELIEF FROM STAY PROCEEDINGS	A108	L300	Review correspondence from M. Wyrick, JGB's counsel regarding discovery deadlines and JGB's opposition to extending the hearing date on the stay relief and dismissal request motion (.1); correspondence with the Debtor team regarding the same (.1)	\$525.00	0.2	\$105.00
07/19/2022	CS	BUSINESS OPERATIONS	A104	B210	Review loan documents to assess JGB's interest in cash collateral (.3); correspondence with M. Kabatoff regarding whether there is authority under the loan documents for JGB's request/restrictio n on authorization to deposit insurance check that attempts to forbid use of cash without JGB's consent (.1).	\$525.00	0.4	\$210.00
07/20/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	TR410	Review, edit and revise Blouin declaration and correspondence with Debtor team regarding the same.	\$525.00	1.5	\$787.50

07/20/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L250	Attend to correspondence with M. Kabatoff regarding monthly operating report.	\$525.00	0.2	\$105.00
07/20/2022	CS	BUSINESS OPERATIONS	A106	B210	Correspondence with M. Kabatoff and L. Blouin regarding endorsement needed from JGB for insurance reimbursement.	\$525.00	0.2	\$105.00
07/21/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A104	L430	Review and provide comments to draft monthly operating report (.2); multiple correspondence with M. Kabatoff regarding the same (.1).	\$525.00	0.3	\$157.50
07/21/2022	CS	BUSINESS OPERATIONS	A108	B210	Multiple correspondence with R. Kanowitz, JGB's counsel, and Debtor team regarding insurance reimbursement check deposit and deposit authorization issues and payment of insurance premiums.	\$525.00	0.3	\$157.50
07/22/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A104	L430	Review and file June monthly operating report (.2); attend to correspondence with the Debtor team regarding the same (.1).	\$525.00	0.3	\$157.50
07/23/2022	CS	BUSINESS OPERATIONS	A106	B210	Multiple correspondence with Debtor's team regarding insurance reimbursement check deposit and use issue.	\$525.00	0.2	\$105.00
07/25/2022	CS	BUSINESS OPERATIONS	A108	B210	Multiple correspondence with R. Kanowitz, JGB's counsel, and Debtor's team regarding insurance deposit authorization.	\$525.00	0.3	\$157.50

07/26/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L120	Call with L. Blouin to discuss dismissal and stay relief motions, discovery and related matters (.6); multiple e-correspondence with the Debtor team regarding the same (.2).	\$525.00	0.8	\$420.00
07/27/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A106	B160	Correspondence with Debtor team regarding narrative and broker engagement.	\$525.00	0.2	\$105.00
07/28/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L120	Call with L. Blouin regarding background narrative and items needed for defense of motions to dismiss and stay relief (.5); attend to multiple email correspondence with L. Blouin and other members of Debtor team regarding the same (.2).	\$525.00	0.7	\$367.50
07/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A103	L250	Review and revise background narrative and circulate the same to Debtor team.	\$525.00	0.4	\$210.00
07/28/2022	CS	BUSINESS OPERATIONS	A108	B210	Multiple correspondence with R. Kanowitz and L. Blouin regarding insurance reimbursement check deposit, use of funds and flood insurance.	\$525.00	0.2	\$105.00
07/28/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A106	B160	Multiple correspondence with Debtor team regarding update on broker engagement and related matters.	\$525.00	0.2	\$105.00
07/29/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Correspondence with M. Kabatoff and L. Blouin regarding broker engagement.	\$525.00	0.1	\$52.50

07/29/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L300	Prepare deposition notices for JGB personnel and FTI appraiser and circulate the same to Debtor team for review and comments.	\$525.00	0.8	\$420.00
07/30/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A103	B160	Review and provide comments to broker engagement agreements and circulate the same to L. Blouin.	\$525.00	0.3	\$157.50
07/30/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L300	Correspondence with L. Blouin and M. Kabatoff regarding discovery matters.	\$525.00	0.2	\$105.00
07/31/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	B320	Begin drafting Debtor's motion to extend exclusivity period.	\$525.00	0.3	\$157.50
08/01/2022	CS	RELIEF FROM STAY PROCEEDINGS	A107	L601	Multiple correspondence with M. Wyrick, JGB's counsel, regarding meet and confer.	\$525.00	0.2	\$105.00
08/01/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L300	Multiple correspondence with Debtor team regarding deposition notices and discovery matters.	\$525.00	0.2	\$105.00
08/01/2022	CS	PLAN AND DISCLOSURE STATEMENT	A102	L430	Conduct case law research and analysis regarding granting of extension of exclusivity period to file plan and solicit acceptances to plan.	\$525.00	0.7	\$367.50
08/01/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	L430	Continue drafting motion to extend exclusivity period to file plan and solicit acceptances to plan.	\$525.00	1.0	\$525.00

08/02/2022	CS	RELIEF FROM STAY PROCEEDINGS	A107	L601	Correspondence with M. Wyrick regarding meet and confer date and time.	\$525.00	0.1	\$52.50
08/02/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Call with M. Augustine, Sotheby's counsel, regarding status of Sotheby's agreement.	\$525.00	0.3	\$157.50
08/02/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	L430	Continue drafting motion to extend exclusivity period.	\$525.00	0.6	\$315.00
08/03/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	B320	Review, edit and revise motion to extend exclusivity and circulate draft to Debtor team for review and comment.	\$525.00	0.7	\$367.50
08/03/2022	CS	BUSINESS OPERATIONS	A108	B210	Multiple correspondence with R. Kanowitz, JGB's counsel, the W. Birmingham, U.S. Trustee, and Debtor team regarding insurance issues.	\$525.00	0.3	\$157.50
08/03/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A106	B160	Multiple correspondence with M. Kabatoff regarding broker agreements and retention application.	\$525.00	0.2	\$105.00
08/03/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Email correspondence with Courtroom Deputy Y. Mills re: setting exclusivity motion and broker retention application for hearing on August 31.	\$525.00	0.1	\$52.50
08/04/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Multiple correspondence with Debtor team regarding case history/narrative and case administration matters.	\$525.00	0.3	\$157.50

08/05/2022	CS	FINANCING	A106	B230	Multiple correspondence with M. Kabatoff and L. Blouin regarding refinancing letter from lender.	\$525.00	0.3	\$157.50
08/05/2022	CS	BUSINESS OPERATIONS	A106	B210	Correspondence with L. Blouin and M. Kabatoff regarding insurance renewal.	\$525.00	0.1	\$52.50
08/05/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A106	B160	Correspondence with L. Blouin and M. Kabatoff regarding finalizing broker agreements.	\$525.00	0.1	\$52.50
08/05/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Multiple correspondence with L. Blouin regarding investigation/research/development of background facts/history.	\$525.00	0.2	\$105.00
08/06/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A103	B160	Multiple correspondence with L. Blouin and M. Kabatoff regarding Nest Seekers agreements, comments to the agreements and finalizing and signing of the same.	\$525.00	0.3	\$157.50
08/06/2022	CS	PLAN AND DISCLOSURE STATEMENT	A106	L430	Correspondence with L. Blouin regarding comments to motion to extend exclusivity period.	\$525.00	0.2	\$105.00
08/06/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	L430	Revise motion to extend exclusivity period to incorporate comments received.	\$525.00	0.2	\$105.00
08/06/2022	CS	FINANCING	A106	B230	Correspondence with L. Blouin regarding financing letter from lender.	\$525.00	0.1	\$52.50

08/06/2022	CS	BUSINESS OPERATIONS	A106	B210	Correspondence with L. Blouin and M. Kabatoff regarding insurance reimbursement check deposit status.	\$525.00	0.1	\$52.50
08/06/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Multiple correspondence with L. Blouin regarding background facts/history.	\$525.00	0.2	\$105.00
08/07/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	L430	Review, edit, revise, finalize and file motion to extend exclusivity period and correspondence with L. Blouin and other members of Debtor team regarding the same.	\$525.00	0.6	\$315.00
08/07/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A104	B160	Review, edit, revise, finalize and file broker retention application and correspondence with L. Blouin and other members of Debtor team regarding the same.	\$525.00	0.6	\$315.00
08/07/2022	CS	FINANCING	A106	B230	Correspondence with L. Blouin regarding letter from lender regarding refinancing.	\$525.00	0.1	\$52.50
08/07/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Multiple correspondence with L. Blouin regarding further case background facts.	\$525.00	0.3	\$157.50
08/08/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A108	B160	Call with G. Gifkins at Nest Seekers regarding filing of retention application, marketing of property, court approval process and August 31 hearing attendance.	\$525.00	0.2	\$105.00

08/08/2022	CS	BUSINESS OPERATIONS	A106	B210	Call and email correspondence with L. Blouin regarding insurance check deposit issue.	\$525.00	0.7	\$367.50
08/08/2022	CS	BUSINESS OPERATIONS	A108	B210	Correspondence with L. Blouin and U.S. Trustee regarding renewal of insurance for 366 Gin Lane.	\$525.00	0.2	\$105.00
08/09/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Numerous correspondence with L. Blouin and M. Kabatoff regarding case background/history, including events that occurred in state court proceedings, and development of the narrative regarding the same.	\$525.00	0.5	\$262.50
08/09/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A102	L110	Research and pull various pleadings related to pre-petition state court proceedings regarding 366 Gin Lane and attend to correspondence with M. Kabatoff and L. Blouin regarding the same.	\$525.00	0.4	\$210.00
08/09/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	B400	Numerous correspondence with L. Blouin and M. Kabatoff regarding Court's lack of jurisdiction over 376 Gin Lane owned by non-debtor Aberdeen.	\$525.00	0.3	\$157.50
08/09/2022	CS	BUSINESS OPERATIONS	A103	B210	Review and provide comments to Blouin declaration/affidavit regarding insurance check deposit issue.	\$525.00	0.2	\$105.00

08/09/2022	CS	BUSINESS OPERATIONS	A108	B210	Correspondence with R. Kanowitz, JGB's counsel, and the Debtor team regarding the property insurance renewal.	\$525.00	0.2	\$105.00
08/09/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L300	Numerous correspondence with L. Blouin and M. Kabatoff regarding discovery requests, discovery planning and next steps.	\$525.00	0.3	\$157.50
08/09/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Numerous general correspondence with L. Blouin and M. Kabatoff regarding various miscellaneous case questions, next steps regarding motions and litigation and fact development.	\$525.00	0.4	\$210.00
08/10/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L300	Multiple correspondence with L. Blouin and M. Kabatoff regarding discovery and meet and confer matters.	\$525.00	0.3	\$157.50
08/10/2022	CS	BUSINESS OPERATIONS	A106	B210	Review and provide comments to revised Blouin affidavit/declaration regarding insurance check deposit issue and multiple correspondence with M. Kabatoff and L. Blouin regarding the same.	\$525.00	0.3	\$157.50
08/10/2022	CS	BUSINESS OPERATIONS	A106	B210	Various correspondence with M. Kabatoff, L. Blouin, R. Kanowitz, JGB's counsel, and W. Birmingham, U.S. Trustee, regarding flood insurance renewal.	\$525.00	0.2	\$105.00

08/10/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A104	B250	Review Nest Seekers rental pricing and marketing plan forwarded by L. Blouin.	\$525.00	0.2	\$105.00
08/10/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L110	Numerous correspondence with L. Blouin regarding case background/histo ry and development of the narrative regarding the same.	\$525.00	0.2	\$105.00
08/10/2022	CS	LITIGATION- MOTION TO DISMISS	A104	L120	Review motion to dismiss in preparation for preparing response.	\$525.00	0.6	\$315.00
08/11/2022	CS	LITIGATION- MOTION TO DISMISS	A101	L601	Review pleadings, discovery requests and other materials in preparation for meet and confer with JGB's counsel.	\$525.00	0.5	\$262.50
08/11/2022	CS	LITIGATION- MOTION TO DISMISS	A106	L300	Correspondence with L. Blouin and M. Kabatoff regarding scheduling deposition and other discovery matters.	\$525.00	0.2	\$105.00
08/11/2022	CS	LITIGATION- MOTION TO DISMISS	A107	L601	Attend meet and confer with M. Wyrick and L. Thorne, attorneys for JGB.	\$525.00	0.4	\$210.00
08/11/2022	CS	LITIGATION- MOTION TO DISMISS	A104	L110	Review May 25 hearing transcript, exhibit to JGB's motions.	\$525.00	0.6	\$315.00
08/12/2022	CS	BUSINESS OPERATIONS	A108	B210	Call and email correspondence with U.S. Trustee regarding insurance check deposit issues and recent bank statements.	\$525.00	0.3	\$157.50
08/12/2022	CS	BUSINESS OPERATIONS	A106	B210	Multiple correspondence with L. Blouin and M. Kabatoff regarding insurance check deposit.	\$525.00	0.2	\$105.00

08/12/2022	CS	LITIGATION-MOTION TO DISMISS	A107	B150	Review recap of meet and confer and follow up items circulated by M. Wyrick, JGB's counsel.	\$525.00	0.2	\$105.00
08/12/2022	CS	LITIGATION-MOTION TO DISMISS	A106	B150	Correspondence with L. Blouin and M. Kabatoff regarding recap of meet and confer circulated by M. Wyrick.	\$525.00	0.1	\$52.50
08/12/2022	CS	LITIGATION	A106	L110	Correspondence with L. Blouin and M. Kabatoff regarding case background/facts for potential litigation.	\$525.00	0.2	\$105.00
08/12/2022	CS	LITIGATION-MOTION TO DISMISS	A104	L300	Review revised deposition notice filed by JGB and forward the same to Debtor team.	\$525.00	0.1	\$52.50
08/12/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A102	L120	Research and analysis regarding legality of fees, interests and charges under JGB loan.	\$525.00	0.6	\$315.00
08/14/2022	CS	RELIEF FROM STAY PROCEEDINGS	A102	L120	Attend to case law research and analysis regarding defense of stay relief motion.	\$525.00	1.3	\$682.50
08/14/2022	CS	LITIGATION-MOTION TO DISMISS	A102	L120	Attend to case law research and analysis regarding defense of dismissal motion.	\$525.00	1.7	\$892.50
08/14/2022	CS	RELIEF FROM STAY PROCEEDINGS	A107	JM30	Draft and send correspondence to M. Wyrick, counsel to JGB, regarding scheduling evidentiary hearing on mutually agreeable date given amount of evidence to be presented.	\$525.00	0.2	\$105.00

08/14/2022	CS	LITIGATION-MOTION TO DISMISS	A107	L300	Prepare and send correspondence to M. Wyrick, JGB's counsel, regarding request to extend response deadline for JGB's discovery requests.	\$525.00	0.1	\$52.50
08/14/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L300	Multiple correspondence with M. Kabatoff and L. Blouin regarding discovery matters.	\$525.00	0.3	\$157.50
08/14/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L110	Numerous correspondence with M. Kabatoff and L. Blouin regarding development of factual narrative, background and history for case and litigation.	\$525.00	0.6	\$315.00
08/14/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A106	L120	Correspondence with L. Blouin and M. Kabatoff regarding bases for objection to JGB's proofs of claim.	\$525.00	0.2	\$105.00
08/15/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L310	Draft Debtor's first request for production and interrogatories and correspondence with M. Kabatoff and L. Blouin regarding the same.	\$525.00	0.4	\$210.00
08/15/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A106	L110	Various correspondence with L. Blouin regarding various matters regarding JGB's claims.	\$525.00	0.2	\$105.00
08/15/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L120	Call with M. Kabatoff regarding upcoming hearings and discovery.	\$525.00	0.6	\$315.00

08/15/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A104	L210	Review objection to exclusivity motion and broker application filed by JGB and correspondence with Debtor team regarding the same.	\$525.00	0.8	\$420.00
08/15/2022	CS	LITIGATION-MOTION TO DISMISS	A104	JM30	Review contested matter scheduling order and correspondence with Debtor team and Y. Mills regarding the same.	\$525.00	0.3	\$157.50
08/15/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Begin drafting response to motion to dismiss.	\$525.00	0.7	\$367.50
08/15/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L210	Begin drafting response to stay relief motion.	\$525.00	0.7	\$367.50
08/15/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L300	Multiple correspondence with Debtor team regarding discovery.	\$525.00	0.4	\$210.00
08/15/2022	CS	LITIGATION-MOTION TO DISMISS	A106	JM30	Multiple correspondence with L. Blouin and M. Kabatoff regarding hearing prep.	\$525.00	0.5	\$262.50
08/15/2022	CS	LITIGATION-MOTION TO DISMISS	A107	JM30	Review correspondence from M. Wyrick regarding JGB's denial of moving hearing date and discovery request response extension.	\$525.00	0.1	\$52.50
08/15/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Multiple correspondence with L. Blouin and M. Kabatoff regarding various case matters.	\$525.00	0.5	\$262.50

08/16/2022	CS	BUSINESS OPERATIONS	A108	B210	Multiple correspondence with R. Kanowitz, counsel to JGB, and W. Birmingham, U.S. Trustee, regarding insurance check deposit and insurance renewals.	\$525.00	0.3	\$157.50
08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L310	Correspondence with M. Kabtoff and L. Blouin regarding Debtor's discovery requests (.2); revise discovery requests and circulate the same to JGB's counsel (.3).	\$525.00	0.5	\$262.50
08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A108	L410	Call and email correspondence with N. Hubbard at Nathan Capital regarding hearing, deposition and affidavit (.5); multiple correspondence with M. Kabatoff regarding the same (.2).	\$525.00	0.7	\$367.50
08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A106	JM30	Calls and e-correspondence with L. Blouin and M. Kabatoff regarding items needed for discovery and upcoming hearing.	\$525.00	0.7	\$367.50
08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A107	L330	Correspondence with M. Wyrick regarding scheduling of JGB and FTI depositions.	\$525.00	0.2	\$105.00
08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L330	Revise, finalize and file JGB and FTI deposition notices and circulate the same to U.S. Trustee, JGB counsel and Debtor team.	\$525.00	0.3	\$157.50

08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A108	L330	Correspondence with M. Kabatoff and deposition provider regarding deposition matters.	\$525.00	0.3	\$157.50
08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L110	Call and correspondence with L. Blouin regarding narrative re: affidavits and fact development.	\$525.00	0.5	\$262.50
08/16/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L210	Continue drafting response to stay relief motion.	\$525.00	0.6	\$315.00
08/16/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Continue drafting response to motion to dismiss.	\$525.00	0.6	\$315.00
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A113	JM30	Call with M. Vargas regarding affidavit for August 31 hearing and possible deposition.	\$525.00	0.3	\$157.50
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Begin drafting Michael Vargas affidavit.	\$525.00	0.3	\$157.50
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L300	Multiple correspondence with L. Blouin and M. Kabatoff regarding discovery, hearing prep issues and related matters.	\$525.00	0.5	\$262.50
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A108	L330	Correspondence with JGB's counsel and other parties regarding depositions.	\$525.00	0.2	\$105.00
08/17/2022	CS	BUSINESS OPERATIONS	A108	B210	Correspondence with R. Kanowitz, JGB's counsel, and M. Kabatoff regarding insurance check deposit.	\$525.00	0.2	\$105.00
08/17/2022	CS	LITIGATION	A103	L120	Review Prosser narrative and provide edits and comments to L. Blouin.	\$525.00	0.4	\$210.00

08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A113	JM30	Correspondence with R. Feldman, Nest Seekers attorney, and G. Gifkins at Nest Seekers regarding deposition and affidavit in preparation for hearing.	\$525.00	0.3	\$157.50
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A104	L210	Review order denying JGB's motion to seal and circulate to L. Blouin and M. Kabatoff.	\$525.00	0.1	\$52.50
08/17/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Email correspondence with L. Blouin and M. Kabatoff regarding July monthly operating report due on August 20.	\$525.00	0.1	\$52.50
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A108	JM30	Correspondence with Court Law Clerk and JGB's counsel regarding allowing witnesses to appear virtually and motion for leave.	\$525.00	0.1	\$52.50
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L100	Review updated scheduling order and circulate the same to L. Blouin and M. Kabatoff.	\$525.00	0.1	\$52.50
08/17/2022	CS	LITIGATION-MOTION TO DISMISS	A107	L320	Produce response to interrogatories to JGB's counsel.	\$525.00	0.2	\$105.00
08/18/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Prepare M. Vargas (appraiser) affidavit and circulate the same to M. Vargas, L. Blouin and M. Kabatoff.	\$525.00	0.7	\$367.50
08/18/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Prepare N. Hubbard (loan broker) affidavit and circulate the same to M. Vargas, L. Blouin and M. Kabatoff.	\$525.00	0.4	\$210.00

08/18/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with M. Kabatoff and L. Blouin regarding payment of U.S. Trustee fees.	\$525.00	0.1	\$52.50
08/18/2022	CS	LITIGATION- MOTION TO DISMISS	A107	L330	Correspondence with JGB's counsel regarding depositions.	\$525.00	0.2	\$105.00
08/18/2022	CS	LITIGATION- MOTION TO DISMISS	A107	L190	Correspondence with R. Kanowitz, JGB's counsel, regarding impact of public disclosure of appraisal.	\$525.00	0.2	\$105.00
08/18/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Email correspondence with W. Birmingham, U.S. Trustee, regarding monthly operating report and other case matters.	\$525.00	0.2	\$105.00
08/19/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Call with W. Birmingham, U.S. Trustee, regarding various case matters.	\$525.00	0.4	\$210.00
08/19/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Email correspondence with W. Birmingham, U.S. Trustee, regarding comments to broker retention application, order and agreements.	\$525.00	0.2	\$105.00
08/19/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A108	B160	Call and email correspondence with R. Feldman, broker's attorney, regarding UST's comments to broker agreements and related matters.	\$525.00	0.3	\$157.50
08/19/2022	CS	LITIGATION- MOTION TO DISMISS	A103	L210	Review, edit and revise Blouin affidavit.	\$525.00	2.5	\$1,312.50

08/20/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A103	P400	Review and provide comments to draft monthly operating report (.2); multiple correspondence with L. Blouin and M. Kabatoff regarding the same (.2).	\$525.00	0.4	\$210.00
08/20/2022	CS	LITIGATION- MOTION TO DISMISS	A103	L210	Continue drafting response to motion to dismiss.	\$525.00	0.6	\$315.00
08/20/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L210	Continue drafting response to motion for stay relief.	\$525.00	0.5	\$262.50
08/21/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L210	Finalize initial draft of response to motion for stay relief and circulate the same to L. Blouin and M. Kabatoff for review.	\$525.00	0.5	\$262.50
08/21/2022	CS	LITIGATION- MOTION TO DISMISS	A103	L210	Finalize initial draft of response to motion to dismiss and circulate the same to L. Blouin and M. Kabatoff for review.	\$525.00	0.5	\$262.50
08/21/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A104	P400	Review, finalize, file and circulate July monthly operating report to W. Birmingham, UST.	\$525.00	0.2	\$105.00
08/21/2022	CS	LITIGATION- MOTION TO DISMISS	A103	L210	Review and revise Nest Seekers affidavit circulated by Nest Seeker's attorney R. Feldman to put affidavit in filing form (.5); attend to correspondence with R. Feldman, G. Gifkins, L. Blouin and M. Kabatoff regarding the same (.2).	\$525.00	0.7	\$367.50

08/21/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L210	Multiple correspondence with L. Blouin regarding finalizing Vargas and Hubbard affidavits.	\$525.00	0.2	\$105.00
08/21/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Calls and e-correspondence with L. Blouin regarding multiple comments and changes to Blouin affidavit (1); revise Blouin affidavit and exhibits (1).	\$525.00	2.0	\$1,050.00
08/21/2022	CS	LITIGATION-MOTION TO DISMISS	A114	L210	Correspondence with appraiser M. Vargas regarding finalizing and signing affidavit.	\$525.00	0.1	\$52.50
08/22/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Finalize and file appraiser and loan broker affidavits and correspondence with M. Vargas, N. Hubbard, L. Blouin, and M. Kabatoff regarding the same.	\$525.00	0.3	\$157.50
08/22/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Review, revise and finalize Blouin affidavit and multiple correspondence with L. Blouin and M. Kabatoff regarding the same.	\$525.00	0.6	\$315.00
08/22/2022	CS	FINANCING	A106	B210	Correspondence with L. Blouin and M. Kabatoff regarding memo needed for lender re: refinancing.	\$525.00	0.1	\$52.50
08/23/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L120	Call with L. Blouin regarding her comments to responses to dismissal and stay relief motions.	\$525.00	0.5	\$262.50
08/23/2022	CS	LITIGATION-MOTION TO DISMISS	A114	L130	Prepare and send email correspondence with M. Vargas regarding response to Vanderbilt appraisal.	\$525.00	0.1	\$52.50

08/23/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A113	L130	Call with G. Gifkins regarding various case matters and sale process.	\$525.00	0.3	\$157.50
08/23/2022	CS	LITIGATION- MOTION TO DISMISS	A108	L330	Call with R. Feldman, Nest Seekers, counsel, regarding deposition and case matters.	\$525.00	0.1	\$52.50
08/23/2022	CS	LITIGATION- MOTION TO DISMISS	A104	L300	Review JGB's Objections & Responses to Debtor's RFPs & ROGS.	\$525.00	0.5	\$262.50
08/23/2022	CS	LITIGATION- MOTION TO DISMISS	A103	L210	Draft, revise and finalize response to JGB's motion to dismiss and correspondence with L. Blouin and M. Kabatoff regarding the same.	\$525.00	0.4	\$210.00
08/24/2022	CS	LITIGATION- MOTION TO DISMISS	A109	L330	Attend and participate in G. Gifkins, Nest Seekers, deposition.	\$525.00	3.0	\$1,575.00
08/24/2022	CS	LITIGATION- MOTION TO DISMISS	A106	L120	Call with L. Blouin regarding discovery, litigation update and related matters.	\$525.00	0.7	\$367.50
08/24/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A104	L210	Review Sotheby's objection to Nest Seekers retention application and correspondence with L. Blouin and M. Kabatoff regarding the same.	\$525.00	0.4	\$210.00
08/24/2022	CS	LITIGATION- MOTION TO DISMISS	A103	L310	Correspondence with L. Blouin regarding additional request for production of documents (.3); prepare second request for production and circulate the same to JGB's counsel (.2).	\$525.00	0.5	\$262.50

08/24/2022	CS	LITIGATION-MOTION TO DISMISS	A106	L300	Correspondence with L. Blouin and M. Kabatoff regarding production of documents for JGB discovery requests.	\$525.00	0.3	\$157.50
08/24/2022	CS	LITIGATION-MOTION TO DISMISS	A113	L410	Correspondence with N. Hubbard regarding deposition timeframe.	\$525.00	0.1	\$52.50
08/25/2022	CS	LITIGATION-MOTION TO DISMISS	A109	L330	Attend and defend N. Hubbard (refinancing fact witness) deposition.	\$525.00	2.0	\$1,050.00
08/26/2022	CS	LITIGATION-MOTION TO DISMISS	A109	L330	Prepare for Dunec deposition.	\$525.00	2.0	\$1,050.00
08/26/2022	CS	LITIGATION-MOTION TO DISMISS	A101	L330	Conduct deposition of Mark Dunec, JGB's appraiser.	\$525.00	1.5	\$787.50
08/28/2022	CS	LITIGATION	A103	L250	Draft reply and file reply to JGB's objections to Debtor's motion and application (.7); attend to multiple correspondence with team regarding the same (1).	\$525.00	1.7	\$892.50
08/28/2022	CS	ASSET DISPOSITION/SALES/LEASES/RENTALS	A108	B130	Call with G. Gifkins at Nest Seekers regarding written offer to purchase.	\$525.00	0.3	\$157.50
08/29/2022	CS	LITIGATION-MOTION TO DISMISS	A101	L330	Deposition prep with L. Blouin.	\$525.00	7.2	\$3,780.00
08/29/2022	CS	LITIGATION-MOTION TO DISMISS	A108	JM30	Multiple correspondence with A. Willie, law clerk to Judge Trust, and various parties regarding August 31 hearing logistics, etc.	\$525.00	0.2	\$105.00

08/29/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A103	B160	Revise proposed order regarding broker retention application and circulate the same to W. Birmingham and R. Feldman (.3); correspondence regarding revised broker agreements (.1).	\$525.00	0.4	\$210.00
08/30/2022	CS	LITIGATION-MOTION TO DISMISS	A109	L330	Attend and defend L. Blouin deposition.	\$525.00	5.2	\$2,730.00
08/30/2022	CS	LITIGATION-MOTION TO DISMISS	A109	L330	Attend and take deposition of Brett Cohen of JGB.	\$525.00	2.5	\$1,312.50
08/30/2022	CS	LITIGATION-MOTION TO DISMISS	A101	JM30	Attend to hearing prep.	\$525.00	3.0	\$1,575.00
08/30/2022	CS	ASSET DISPOSITION/SALES/LEASES/RENTALS	A103	L210	Prepare and file notice of offer for sale and rent.	\$525.00	0.2	\$105.00
08/31/2022	CS	LITIGATION-MOTION TO DISMISS	A101	JM30	Meetings with L. Blouin and review of materials and arguments in preparation for morning's hearing.	\$525.00	2.5	\$1,312.50
08/31/2022	CS	LITIGATION-MOTION TO DISMISS	A109	L450	Attend and participate in contested matters hearing.	\$525.00	2.5	\$1,312.50
08/31/2022	CS	FINANCING	A106	B230	Email correspondence with L. Blouin regarding memo for refinancing efforts.	\$525.00	0.2	\$105.00
08/31/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	L210	Revise proposed exclusivity motion order per Court's rulings and order and circulate the same to UST and counsel to JGB.	\$525.00	0.2	\$105.00
08/31/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A103	B160	Revise proposed broker retention application order per Court's rulings and order and circulate the same to UST and counsel to JGB.	\$525.00	0.2	\$105.00

08/31/2022	CS	LITIGATION-MOTION TO DISMISS	A103	L210	Review and provide comments to JGB's proposed motion to dismiss and stay relief orders (.4); and correspondence with JGB's counsel regarding the same (.1).	\$525.00	0.5	\$262.50
08/31/2022	CS	PLAN AND DISCLOSURE STATEMENT	A104	L210	Review JGB's counsel's comments to proposed orders granting exclusivity motion and broker retention application.	\$525.00	0.2	\$105.00
09/02/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A108	L210	Communications with R. Feldman, counsel to Nest Seekers, and JGB's counsel regarding rejection of JGB changes to Nest Seekers retention order.	\$525.00	0.3	\$157.50
09/03/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A106	B310	Multiple correspondence with L. Blouin and M. Kabatoff regarding appeal and claims issues.	\$525.00	0.8	\$420.00
09/04/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A106	B310	Multiple follow up correspondence with L. Blouin and M. Kabatoff regarding appeal and claims issues.	\$525.00	0.7	\$367.50
09/04/2022	CS	ASSET DISPOSITION/SALES/LEASES/RENTALS	A108	L110	Correspondence with R. Kanowitz, JGB's counsel, and L. Blouin and M. Kabatoff regarding whether or not JGB was financing Chris Brown offer submitted by Sotheby's.	\$525.00	0.2	\$105.00

09/05/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	L110	Additional correspondence with R. Kanowitz, JGB's counsel, and L. Blouin and M. Kabatoff regarding JGB's response regarding whether or not JGB was financing Chris Brown offer submitted by Sotheby's.	\$525.00	0.2	\$105.00
09/06/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A104	L100	Review offer information and the marketing activity report circulated by G. Gifkins.	\$525.00	0.2	\$105.00
09/06/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A103	L210	Finalize broker retention order and attend to correspondence with JGB's counsel and broker's counsel regarding the same.	\$525.00	0.2	\$105.00
09/06/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	L210	Finalize exclusivity extension order and attend to correspondence with JGB's counsel regarding the same.	\$525.00	0.2	\$105.00
09/06/2022	CS	LITIGATION- MOTION TO DISMISS	A103	L210	Provide final comments/edits to dismissal/stay relief order and attend to correspondence with JGB's counsel regarding the same.	\$525.00	0.2	\$105.00
09/06/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A103	L210	Begin drafting Sale Motion.	\$525.00	0.4	\$210.00
09/06/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	L210	Begin drafting plan and disclosure statement.	\$525.00	0.3	\$157.50
09/07/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	L100	Correspondence with G. Gifkins and Sotheby's counsel regarding offer from Chris Brown.	\$525.00	0.2	\$105.00

09/07/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A106	L100	Multiple correspondence with L. Blouin regarding sale offer and related case matters.	\$525.00	0.3	\$157.50
09/08/2022	CS	LITIGATION- MOTION TO DISMISS	A107	L300	Correspondence with R. Kanowitz regarding third request for production.	\$525.00	0.1	\$52.50
09/08/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Correspondence with W. Birmingham, U.S. Trustee, and L. Blouin and M. Kabatoff regarding insurance installment payment.	\$525.00	0.2	\$105.00
09/08/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with M. Kabatoff regarding DIP account status.	\$525.00	0.1	\$52.50
09/09/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A106	B310	Correspondence with L. Blouin regarding referee's report.	\$525.00	0.2	\$105.00
09/10/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with L. Blouin regarding bankruptcy process issues.	\$525.00	0.1	\$52.50
09/11/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A106	L100	Correspondence with L. Blouin regarding sale and claim issues.	\$525.00	0.2	\$105.00
09/11/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	L100	Correspondence with L. Blouin and W. Birmingham, U.S. Trustee, regarding sale/refinancing update request.	\$525.00	0.2	\$105.00
09/13/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	L100	Correspondence with R. Kanowitz and L. Blouin regarding sale update request.	\$525.00	0.2	\$105.00
09/13/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	L100	Correspondence with G. Gifkins at Nest Seekers regarding form purchase and sale agreement.	\$525.00	0.1	\$52.50

09/13/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	L100	Correspondence with M. Kabatoff and W. Birmingham, U.S. Trustee, regarding sale update from Nest Seekers and refinancing update from L. Blouin.	\$525.00	0.2	\$105.00
09/13/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A108	L100	Correspondence with R. Kanowitz, JGB's counsel, and G. Gifkins at Nest Seekers regarding sale update from Nest Seekers.	\$525.00	0.2	\$105.00
09/14/2022	CS	FINANCING	A108	B230	Call with L. Blouin and email with N. Hubbard regarding financing proposal.	\$525.00	0.2	\$105.00
09/15/2022	CS	FINANCING	A108	B230	Call with J. Miller, prospective lender, regarding exit financing proposal.	\$525.00	0.2	\$105.00
09/15/2022	CS	LITIGATION	A108	L120	Numerous correspondence with L. Blouin, M. Kabatoff and B. Messenger, Special Litigation Counsel at Duane Morris, regarding appeal.	\$525.00	0.3	\$157.50
09/15/2022	CS	LITIGATION	A108	L120	Call with B. Messenger at Duane Morris regarding appeal and other litigation and special counsel role.	\$525.00	0.7	\$367.50
09/16/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L210	Draft motion to clarify/reconsider Court's August 31 orders and motion to expedite hearing and multiple correspondence with Debtor team regarding the same.	\$525.00	0.7	\$367.50

09/16/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	L110	Multiple correspondence with JGB's counsel and Debtor team regarding JGB's claim and appeal issues.	\$525.00	0.6	\$315.00
09/18/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	B310	Correspondence with R. Kanowitz, JGB's attorney, regarding amount due JGB.	\$525.00	0.1	\$52.50
09/18/2022	CS	LITIGATION	A105	L120	Correspondence with L. Blouin and B. Messinger regarding appeal issues.	\$525.00	0.2	\$105.00
09/18/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	B310	Attend to multiple correspondence to/from R. Kanowitz, JGB's counsel, and Debtor team regarding JGB's claims and appeal.	\$525.00	0.3	\$157.50
09/19/2022	CS	FEE/EMPLOYMEN T APPLICATIONS	A103	L210	Draft application to employ Duane Morris as Special Litigation Counsel and forward the same to Debtor team for review.	\$525.00	1.0	\$525.00
09/19/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	B310	Multiple correspondence with Debtor team and R. Kanowitz regarding JGB's claim amount.	\$525.00	0.3	\$157.50
09/19/2022	CS	LITIGATION	A108	L500	Multiple correspondence with Debtor team and C. Wallshein regarding appeal.	\$525.00	0.2	\$105.00
09/19/2022	CS	ASSET DISPOSITION/SAL ES/LEASES/RENT ALS	A106	L100	Correspondence with L. Blouin and G. Gifkins regarding sale status and Suffolk County records shutdown.	\$525.00	0.2	\$105.00

09/19/2022	CS	LITIGATION	A105	L120	Correspondence with B. Messinger and L. Blouin regarding appeal issues.	\$525.00	0.2	\$105.00
09/20/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A104	B160	Review revised draft Duane Morris retention application and correspondence with B. Messinger regarding the same.	\$525.00	0.3	\$157.50
09/20/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Send email correspondence with L. Blouin and M. Kabatoff regarding monthly operating report.	\$525.00	0.1	\$52.50
09/20/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A105	B310	Correspondence with B. Messinger and L. Blouin regarding issues related to JGB claim amount.	\$525.00	0.3	\$157.50
09/20/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A103	L210	Review, finalize and file monthly operating report and certificate of service (.2); correspondence with L. Blouin and M. Kabatoff regarding the same (.1).	\$525.00	0.3	\$157.50
09/21/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	B320	Attend to drafting plan and disclosure statement.	\$525.00	1.0	\$525.00
09/21/2022	CS	ASSET DISPOSITION/SALES/LEASES/RENTALS	A105	L100	Call with B. Messinger regarding status of refinancing (.1); multiple email correspondence with Debtor team regarding sale and refinancing issues (.2).	\$525.00	0.3	\$157.50
09/21/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	B310	Multiple correspondence with Debtor team regarding objections to JGB's claim amount.	\$525.00	0.4	\$210.00

09/21/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A105	B160	Email correspondence with B. Messenger regarding Duane Morris retention application.	\$525.00	0.1	\$52.50
09/21/2022	CS	RELIEF FROM STAY PROCEEDINGS	A106	L210	Correspondence with Debtor team regarding motion to clarify Court's orders.	\$525.00	0.2	\$105.00
09/21/2022	CS	FINANCING	A103	L210	Attend to drafting motion to approve take-out financing.	\$525.00	0.9	\$472.50
09/22/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A103	B160	Review, edit, finalize and file Duane Morris LLP retention application and notice of presentment of application (.6); and correspondence with Debtor team and notice parties regarding the same (.2).	\$525.00	0.8	\$420.00
09/22/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L200	Revise, edit, finalize and file expedited motions re: clarification/reconsideration of Court's orders (.7); attend to numerous correspondence with Debtor team regarding the same (.8).	\$525.00	1.5	\$787.50
09/24/2022	CS	LITIGATION	A105	L120	Multiple correspondence with L. Blouin and B. Messenger regarding appeal.	\$525.00	0.3	\$157.50
09/25/2022	CS	LITIGATION	A105	L120	Multiple correspondence with Debtor team regarding appeal and appellate brief.	\$525.00	0.2	\$105.00
09/26/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	B320	Attend to drafting of plan and disclosure statement.	\$525.00	0.6	\$315.00
09/26/2022	CS	FINANCING	A103	B230	Attend to drafting exit financing motion.	\$525.00	0.5	\$262.50

09/26/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Review and respond to correspondence from former Debtor's counsel C. Robins regarding pending Brickchurch applications.	\$525.00	0.1	\$52.50
09/26/2022	CS	LITIGATION	A105	L120	Correspondence with L. Blouin and B. Messinger regarding appeal and related litigation and case matters.	\$525.00	0.2	\$105.00
09/27/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Correspondence with UST's office regarding cash receipts and disbursements statements and correspondence with Debtor team regarding the same.	\$525.00	0.2	\$105.00
09/27/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A105	L120	Numerous correspondence with team regarding claims, sale and other case matters.	\$525.00	0.5	\$262.50
09/28/2022	CS	FINANCING	A103	B230	Continue drafting, revising and editing financing motion.	\$525.00	0.6	\$315.00
09/28/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	B320	Continue drafting, revising and editing plan and disclosure statement.	\$525.00	2.0	\$1,050.00
09/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A105	L100	Numerous correspondence with Debtor team regarding financing, claims and various other case matters.	\$525.00	0.6	\$315.00
09/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Correspondence with A. Willie, Judge's law clerk, regarding scheduling of motion to clarify/reconsider and expedited hearing request.	\$525.00	0.2	\$105.00

09/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A103	L100	Draft, file and circulate notice of hearing re: motion to clarify/reconsider and expedited hearing request.	\$525.00	0.3	\$157.50
09/28/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	L100	Correspondence with J. Gervais, UST auditor, and Debtor team regarding cash receipts and disbursements for June, July, and August 2022.	\$525.00	0.1	\$52.50
09/29/2022	CS	FINANCING	A103	B230	Continue drafting, revising and editing financing motion and circulate draft to Debtor team.	\$525.00	0.8	\$420.00
09/29/2022	CS	FINANCING	A103	B230	Review and provide comments to loan term sheet (.3) and numerous correspondence with Debtor team regarding the same (.2).	\$525.00	0.5	\$262.50
09/29/2022	CS	FINANCING	A106	B230	Call with L. Blouin regarding financing motion and confidentiality issues.	\$525.00	0.6	\$315.00
09/29/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	B320	Attend to drafting, revising and editing plan and disclosure statement and circulate drafts to Debtor team for review and comment.	\$525.00	2.5	\$1,312.50
09/30/2022	CS	LITIGATION	A105	L120	Call with B. Messinger, Special Litigation Counsel, regarding financing and litigation issues.	\$525.00	0.2	\$105.00

09/30/2022	CS	FINANCING	A103	B230	Multiple revisions to exit financing motion to incorporate latest revisions to term sheet and comments received from Debtor team; circulate revised draft to team.	\$525.00	0.7	\$367.50
09/30/2022	CS	FINANCING	A105	L210	Multiple follow up communications with Debtor team regarding revisions to exit financing motion to incorporate latest revisions to term sheet and comments.	\$525.00	0.3	\$157.50
09/30/2022	CS	FINANCING	A103	L210	Multiple revisions to motion to seal, finalize and file motion to seal lender identity (.4); multiple correspondence with team regarding the same (.3).	\$525.00	0.7	\$367.50
09/30/2022	CS	PLAN AND DISCLOSURE STATEMENT	A103	B320	Revise, edit, finalize and file plan and disclosure statement and multiple correspondence with Debtor team regarding the same.	\$525.00	2.8	\$1,470.00
10/03/2022	CS	FINANCING	A104	L120	Review JGB's statement regarding October 6 hearing and financing (.3); and multiple correspondence with L. Blouin, M. Kabatoff and B. Messinger regarding the same (.2).	\$525.00	0.5	\$262.50
10/04/2022	CS	FINANCING	A106	L120	Call with L. Blouin regarding October 6 hearing, financing and claims issues.	\$525.00	0.5	\$262.50

10/06/2022	CS	FINANCING	A101	JM30	Review materials and prepare argument in preparation for hearing.	\$525.00	0.6	\$315.00
10/06/2022	CS	FINANCING	A109	JM30	Attend hearing on motion to clarify/reconsider and status conference.	\$525.00	0.9	\$472.50
10/06/2022	CS	FINANCING	A108	L100	Correspondence with R. Kanowitz, JGB's counsel, and Debtor team regarding post-hearing matters and DIP financing objection and deposition of DIP lender.	\$525.00	0.2	\$105.00
10/06/2022	CS	FINANCING	A105	B230	Multiple correspondence with Debtor team regarding financing matters.	\$525.00	0.6	\$315.00
10/06/2022	CS	FINANCING	A103	L210	Draft and file notice of withdrawal of seal motion and unredacted term sheet.	\$525.00	0.2	\$105.00
10/07/2022	CS	FINANCING	A108	L210	Multiple correspondence with R. Kanowitz and M. Wyrick, JGB's counsel, regarding proposed orders and discovery.	\$525.00	0.2	\$105.00
10/07/2022	CS	FINANCING	A105	L120	Multiple calls and communications with Debtor team regarding financing, Court's rulings and next steps.	\$525.00	0.7	\$367.50
10/08/2022	CS	FINANCING	A105	L120	Numerous correspondence and communications with the Debtor team regarding financing issues.	\$525.00	0.7	\$367.50
10/09/2022	CS	FINANCING	A105	L120	Multiple correspondence with Debtor team regarding financing and discovery matters.	\$525.00	0.7	\$367.50

10/09/2022	CS	FINANCING	A103	L120	Attend to drafting statement regarding refinancing and other restructuring issues and multiple correspondence with L. Blouin regarding the same.	\$525.00	1.2	\$630.00
10/09/2022	CS	FINANCING	A108	B230	Correspondence with M. Wyrick, R. Kanowitz and Debtor team regarding discovery and refinancing matters.	\$525.00	0.3	\$157.50
10/10/2022	CS	FINANCING	A103	B230	Attend to multiple revisions to statement regarding restructuring and refinancing and multiple correspondence and calls with L. Blouin and rest of the Debtor team regarding the same.	\$525.00	2.0	\$1,050.00
10/11/2022	CS	FINANCING	A105	B230	Multiple correspondence with Debtor team regarding exit financing and discovery issues.	\$525.00	0.5	\$262.50
10/11/2022	CS	FINANCING	A103	L210	Review and provide comments to motion to quash JGB's discovery requests and correspondence with Debtor team regarding the same.	\$525.00	0.4	\$210.00
10/11/2022	CS	FINANCING	A108	L300	Review correspondence from M. Wyrick, JGB's counsel, and J. Isbell, Bay Point's counsel, regarding JGB's subpoena sent to Bay Point.	\$525.00	0.1	\$52.50

10/12/2022	CS	FINANCING	A105	L120	Correspondence with Debtor team regarding motion to quash and related issues.	\$525.00	0.2	\$105.00
10/12/2022	CS	RELIEF FROM STAY PROCEEDINGS	A103	L210	Review October 6 hearing transcript, review, edit and revised proposed order drafted by JGB's counsel and circulate revisions/comments to Debtor team for further review and comment.	\$525.00	0.4	\$210.00
10/13/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	B310	Multiple correspondence with Debtor team and JGB's counsel regarding joint letter regarding amounts owed to JGB.	\$525.00	0.7	\$367.50
10/13/2022	CS	FINANCING	A108	B140	Correspondence with JGB's counsel and Debtor team regarding comments to automatic stay order.	\$525.00	0.4	\$210.00
10/13/2022	CS	FINANCING	A108	L300	Correspondence with JGB's counsel and Bay Point's counsel regarding meet and confer and objection to JGB's subpoena.	\$525.00	0.3	\$157.50
10/13/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence from M. Kabatoff regarding DIP account.	\$525.00	0.1	\$52.50
10/14/2022	CS	FINANCING	A109	L300	Attend meet and confer with JGB's counsel, the UST and Bay Point's counsel.	\$525.00	0.5	\$262.50

10/14/2022	CS	FINANCING	A103	L210	Multiple correspondence with JGB counsel and Debtor team regarding multiple comments and revisions to automatic stay order and motion to clarify order.	\$525.00	0.3	\$157.50
10/14/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A105	L250	Multiple correspondence with Debtor team regarding joint letter regarding amounts owed to JGB and revisions and comments to joint letter.	\$525.00	0.5	\$262.50
10/15/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A105	L250	Correspondence with Debtor team regarding revised joint letter.	\$525.00	0.2	\$105.00
10/16/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A105	L120	Correspondence with B. Messinger regarding JGB claim.	\$525.00	0.1	\$52.50
10/17/2022	CS	FINANCING	A107	B310	Multiple correspondence with JGB's counsel and Debtor team regarding comments to joint letter and inability to reach a resolution on joint filing.	\$525.00	0.7	\$367.50
10/17/2022	CS	FINANCING	A108	L100	Correspondence with Debtor team and Bay Point's counsel regarding items needed in preparation for October 26 hearing.	\$525.00	0.3	\$157.50
10/17/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with M. Kabatoff regarding DIP account.	\$525.00	0.1	\$52.50

10/18/2022	CS	PLAN AND DISCLOSURE STATEMENT	A108	L100	Correspondence with M. Augustine, counsel to Sotheby's, regarding status of scheduling of plan confirmation and disclosure statement hearing.	\$525.00	0.1	\$52.50
10/18/2022	CS	FINANCING	A108	B230	Multiple communications with Debtor team and Bay Point team regarding definitive financing documents, closing matters and hearing preparation matters.	\$525.00	1.5	\$787.50
10/18/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A103	B310	Multiple communications with Debtor team regarding letter re: amounts owed to JGB (.3); revise letter and draft of additional letter requested by the Court and file the same(.5).	\$525.00	0.8	\$420.00
10/18/2022	CS	FINANCING	A108	L100	Review correspondence with JGB's counsel regarding various matters related to upcoming hearing and financing.	\$525.00	0.2	\$105.00
10/18/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	L100	Correspondence with A. Willie, Judge Trust's law clerk, regarding filing of letters regarding amounts owed to JGB.	\$525.00	0.2	\$105.00
10/19/2022	CS	FINANCING	A108	P200	Due diligence call with Bay Point team and Debtor team to discuss due diligence and closing items.	\$525.00	0.9	\$472.50

10/19/2022	CS	FINANCING	A103	L210	Attend to drafting Blouin Affidavit, Andros Affidavit and Motions regarding payment of JGB claim at closing.	\$525.00	1.5	\$787.50
10/19/2022	CS	FINANCING	A103	L210	Circulate draft Blouin affidavit to Debtor team for review.	\$525.00	0.1	\$52.50
10/19/2022	CS	FINANCING	A103	L210	Circulate shell draft of Andros affidavit to Bay Point team for further drafting and completion.	\$525.00	0.1	\$52.50
10/20/2022	CS	FINANCING	A103	L210	Continue drafting/editing/r evising Blouin Affidavit and Motions regarding payment of JGB claim at closing and circulate the same to Debtor team for review and comment.	\$525.00	0.6	\$315.00
10/20/2022	CS	FINANCING	A109	L300	Meet and confer with JGB's counsel, Bay Point's counsel and U.S. Trustee.	\$525.00	0.4	\$210.00
10/20/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A108	L160	Review correspondence from R. Kanowitz, JGB's counsel, regarding offer to settle JGB claim (.1) and correspondence with Debtor team regarding the same (.3).	\$525.00	0.4	\$210.00
10/20/2022	CS	FINANCING	A111	P500	Numerous correspondence with Debtor team and Bay Point team regarding comments to draft loan agreements and DIP order and various closing and due diligence matters.	\$525.00	0.7	\$367.50

10/20/2022	CS	FINANCING	A103	P500	Review, edit and revise draft DIP Financing Order, DIP Loan Agreement and subordination agreement and circulate the same to Debtor team and/or Bay Point as applicable.	\$525.00	1.3	\$682.50
10/20/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A103	L250	Review monthly operating report documents circulated by M. Kabatoff (.3); attend to correspondence with M. Kabatoff regarding the same (.1); file monthly operating report (.1).	\$525.00	0.5	\$262.50
10/21/2022	CS	FINANCING	A103	L210	Finalize and file Louise Blouin Affidavit and motions regarding payment of JGB at closing (.3); correspondence with Debtor team regarding the same (.2).	\$525.00	0.5	\$262.50
10/21/2022	CS	FINANCING	A108	P600	Multiple correspondence with Bay Point and Debtor team regarding numerous rounds of comments to DIP financing transaction documents and due diligence items.	\$525.00	1.5	\$787.50
10/21/2022	CS	FINANCING	A103	L210	Finalize and file witness and exhibit list and DIP documents and other exhibits for DIP financing hearing.	\$525.00	0.5	\$262.50
10/21/2022	CS	FINANCING	A104	L100	Review witness and exhibit list and Cohen affidavit filed by JGB.	\$525.00	0.3	\$157.50

10/21/2022	CS	FINANCING	A104	L210	Review memorandum of law filed by Bay Point's counsel.	\$525.00	0.3	\$157.50
10/22/2022	CS	FINANCING	A103	L210	Correspondence with L. Blouin regarding adding witness to exhibit list (.1); amend witness and exhibit list and file and circulate the same (.2).	\$525.00	0.3	\$157.50
10/22/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with M. Kabatoff regarding DIP account.	\$525.00	0.1	\$52.50
10/22/2022	CS	FINANCING	A108	L100	Correspondence with A. Willie, Judge Trust's clerk, regarding email courtesy electronic copy of Debtor's exhibits for October 26 hearing.	\$525.00	0.1	\$52.50
10/24/2022	CS	FINANCING	A108	P200	Review correspondence with Debtor team regarding title search.	\$525.00	0.1	\$52.50
10/24/2022	CS	FINANCING	A104	L210	Review JGB limited objection to motion to pay and correspondence with Debtor team regarding the same.	\$525.00	0.3	\$157.50
10/24/2022	CS	FINANCING	A104	L100	Review correspondence from M. Kabatoff regarding certificate of good standing for closing requirements.	\$525.00	0.1	\$52.50
10/24/2022	CS	FINANCING	A103	L120	Comments and drafting of documents related to cross-collateralization issues with respect to non-debtor Aberdeen.	\$525.00	0.5	\$262.50
10/25/2022	CS	FINANCING	A101	JM30	Meeting with Debtor team to prep for exit financing hearing and discuss related matters.	\$525.00	0.8	\$420.00

10/26/2022	CS	FINANCING	A109	L450	Conduct hearing on approval of exit financing and negotiations during hearing regarding settlement with JGB (hearing commenced at 11:34 a.m. and adjourned at 1:45 p.m.).	\$525.00	2.2	\$1,155.00
10/26/2022	CS	FINANCING	A101	JM30	Prior to hearing: preparation for exit financing hearing, including reviewing research and materials and meeting and discussions with Debtor and Bay Point teams.	\$525.00	1.8	\$945.00
10/27/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A106	L100	Correspondence with M. Kabatoff regarding Wells Fargo DIP account.	\$525.00	0.1	\$52.50
10/27/2022	CS	ASSET DISPOSITION/SALES/LEASES/RENTALS	A108	P200	Review correspondence from B. Messinger and S. Millstein regarding title searches.	\$525.00	0.1	\$52.50
10/28/2022	CS	FEE/EMPLOYMENT APPLICATIONS	A103	L210	Draft and file certificate of no objection and upload order re: application to employ Duane Morris LLP as Special Litigation Counsel and correspondence with Debtor team regarding the same.	\$525.00	0.3	\$157.50
10/28/2022	CS	FINANCING	A105	L100	Correspondence with Debtor team and title company regarding survey and other due diligence items and next steps regarding finalizing financing.	\$525.00	0.2	\$105.00

10/30/2022	CS	FINANCING	A103	L210	Attend to revisions to DIP Order to reflect global settlement and Court's rulings at hearing held on October 26.	\$525.00	0.6	\$315.00
10/30/2022	CS	FINANCING	A104	L100	Correspondence with L. Blouin regarding deposition and hearing transcripts related to REYL financing (.2); review and highlight transcript provisions/testimony and circulate the same to L. Blouin (.2).	\$525.00	0.4	\$210.00
10/31/2022	CS	FINANCING	A105	B230	Correspondence with Debtor team regarding closing matters.	\$525.00	0.1	\$52.50
10/31/2022	CS	FINANCING	A103	B230	Revise DIP Order to reflect global settlement and circulate the same to Debtor team and Bay Point team for further comment.	\$525.00	0.4	\$210.00
10/31/2022	CS	FINANCING	A103	B230	Draft Payoff Order and circulate draft to Debtor team and Bay Point team for further comment.	\$525.00	0.3	\$157.50
10/31/2022	CS	FINANCING	A108	L210	Correspondence with R. Kanowitz, JGB's counsel, regarding status of DIP and Payoff orders.	\$525.00	0.1	\$52.50
11/02/2022	CS	FINANCING	A103	L210	Multiple correspondence with Debtor team. Bay Point team and JGB team regarding numerous comments/changes to DIP Order.	\$525.00	0.3	\$157.50

11/03/2022	CS	FINANCING	A108	L210	Numerous follow up correspondence with R. Kanowitz, JGB's counsel, regarding status of DIP and Payoff orders.	\$525.00	0.2	\$105.00
11/03/2022	CS	FINANCING	A105	P600	Numerous correspondence with B. Messinger regarding closing issues.	\$525.00	0.3	\$157.50
11/03/2022	CS	FINANCING	A108	L210	Multiple follow up correspondence with Debtor team. Bay Point team and JGB team regarding numerous comments/changes to DIP Order.	\$525.00	0.4	\$210.00
11/04/2022	CS	FINANCING	A108	L210	Multiple correspondence with Bay Point team. JGB team and Debtor team regarding changes to DIP Order and Payoff Order and assignment of foreclosure issue	\$525.00	0.4	\$210.00
11/04/2022	CS	FINANCING	A102	L120	Multiple correspondence with B. Messinger and L. Blouin regarding lien issues (.3); conduct research and analysis regarding the same (.2).	\$525.00	0.5	\$262.50
11/05/2022	CS	FINANCING	A108	L100	Review email correspondence from B. Messinger regarding resolution of foreclosure issue with Bay Point.	\$525.00	0.1	\$52.50

11/06/2022	CS	FINANCING	A105	L100	Call and email correspondence with B. Messenger and email correspondence with L. Blouin regarding lien and closing issues.	\$525.00	0.3	\$157.50
11/07/2022	CS	FINANCING	A108	L100	Correspondence from R. Kanowitz and B. Messenger regarding status of resolution of final DIP Order language.	\$525.00	0.1	\$52.50
11/07/2022	CS	FINANCING	A108	L100	Numerous correspondence with Bay Point team and Debtor team regarding DIP order and closing items.	\$525.00	0.3	\$157.50
11/08/2022	CS	FINANCING	A108	L100	Numerous correspondence with B. Messenger and Bay Point's counsel regarding closing matters and transaction documents.	\$525.00	0.4	\$210.00
11/08/2022	CS	FINANCING	A108	L100	Review correspondence from C. Robins and B. Messenger regarding right of first refusal status.	\$525.00	0.1	\$52.50
11/09/2022	CS	FINANCING	A108	L100	Numerous correspondence with the Debtor team, JGB team and Bay Point team regarding revisions to the DIP Order and Payoff Order and closing matters.	\$525.00	0.4	\$210.00
11/09/2022	CS	FINANCING	A108	JM20	Multiple correspondence with B. Messenger and J. Allerdig regarding asserted IRS tax lien and title issues.	\$525.00	0.3	\$157.50

11/10/2022	CS	FINANCING	A108	L210	Numerous correspondence with Debtor team, Bay Point team and JGB team regarding finalizing DIP Order and loan document drafts.	\$525.00	0.3	\$157.50
11/10/2022	CS	FINANCING	A108	L210	Correspondence with A. Willie, Judge Trust's law clerk, regarding uploaded orders for Judge's signature before closing.	\$525.00	0.1	\$52.50
11/11/2022	CS	FINANCING	A103	L210	Review, revise, edit, finalize and file motion to strike IRS's erroneous tax liens and multiple correspondence with Debtor team regarding the same.	\$525.00	0.5	\$262.50
11/11/2022	CS	FINANCING	A108	B310	Correspondence with M. Kabatoff and B. Messenger regarding creditor claims and lien issues.	\$525.00	0.2	\$105.00
11/12/2022	CS	FINANCING	A108	B310	Correspondence with L. Blouin, M. Kabatoff and B. Messenger regarding creditor claims and lien issues.	\$525.00	0.2	\$105.00
11/14/2022	CS	FINANCING	A105	P600	Call and various email correspondence with B. Messenger regarding various closing matters.	\$525.00	0.3	\$157.50
11/14/2022	CS	FINANCING	A105	L100	Multiple correspondence with B. Messenger and Duane Morris team regarding motion to strike IRS liens and noticing regarding the same.	\$525.00	0.2	\$105.00

11/14/2022	CS	FINANCING	A108	L100	Review correspondence from J. Allerdig, Bay Point's counsel, and G. Kramer, JGB's counsel, regarding lender's insurance policy.	\$525.00	0.1	\$52.50
11/14/2022	CS	CLAIMS ADMINISTRATION AND OBJECTIONS	A106	B310	Correspondence with M. Kabatoff regarding objection to creditor claims.	\$525.00	0.1	\$52.50
11/14/2022	CS	FINANCING	A108	P600	Review correspondence from J. Allerdig and J. Isbell, Bay Point's counsel, regarding closing items.	\$525.00	0.1	\$52.50
11/14/2022	CS	FINANCING	A105	L100	Review correspondence from B. Messenger regarding certificate of service re: service of IRS for motion to strike.	\$525.00	0.1	\$52.50
11/15/2022	CS	FINANCING	A105	L100	Follow up correspondence with C. Mariney and B. Messenger regarding filing of certificate of service for motion to strike.	\$525.00	0.1	\$52.50
11/15/2022	CS	FINANCING	A108	L210	Multiple correspondence with A. Willie, law clerk to Judge Trust, regarding DIP Order formatting edits.	\$525.00	0.1	\$52.50
11/15/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A105	L100	Review signed and issued payoff order and circulate to the Debtor team.	\$525.00	0.1	\$52.50

11/16/2022	CS	FINANCING	A108	P600	Review numerous correspondence from B. Messinger and J. Allerding regarding various closing matters, including right of first refusal, resolutions, taxes and closing checklist.	\$525.00	0.3	\$157.50
11/16/2022	CS	FINANCING	A105	L210	Correspondence with B. Messinger regarding DIP Financing Order.	\$525.00	0.1	\$52.50
11/16/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A108	JM30	Email correspondence to Courtroom Deputy Y. Mills regarding whether December 14 hearing may be noticed for Zoom instead of in-person.	\$525.00	0.1	\$52.50
11/16/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A105	L100	Email correspondence with Debtor team regarding monthly operating report and fee application due November 21.	\$525.00	0.1	\$52.50
11/17/2022	CS	LITIGATION	A105	L120	Numerous correspondence with B. Messinger and Duane Morris team regarding application of automatic stay to appeal and filing notice of bankruptcy in Second Department.	\$525.00	0.2	\$105.00
11/17/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A104	L210	Review orders entered by the Court and posted to the docket on November 17 and circulate the same to the team.	\$525.00	0.1	\$52.50
11/17/2022	CS	FINANCING	A104	P600	Review email correspondence from J. Allerding regarding remaining closing items.	\$525.00	0.1	\$52.50

11/18/2022	CS	FINANCING	A108	L100	Zoom meeting with B. Messinger, M. Rinaldi at Fidelity, Bay Point team and Certified Title team regarding transaction structure and next steps.	\$525.00	1.1	\$577.50
11/18/2022	CS	FINANCING	A108	L100	Call with B. Messinger and Bay Point team regarding insurance issues.	\$525.00	0.3	\$157.50
11/18/2022	CS	BANKRUPTCY CASE ADMINISTRATION	A105	L100	Correspondence with B. Messinger regarding B. Messinger and Duane Morris notice of appearance.	\$525.00	0.1	\$52.50
11/18/2022	CS	FINANCING	A108	L100	Review correspondence from B. Messinger regarding insurance policies.	\$525.00	0.1	\$52.50
11/18/2022	CS	FINANCING	A108	L100	Review various correspondence from B. Messinger and M. Suarez at Thompson Hine regarding structure of transaction and the law regarding of merger of a mortgage into a foreclosure judgment.	\$525.00	0.2	\$105.00
11/18/2022	CS	FINANCING	A108	L100	Review correspondence from B. Messinger and J. Allerding regarding insurance broker information and authorization.	\$525.00	0.1	\$52.50

11/19/2022	CS	FINANCING	A108	L100	Review correspondence from B. Messinger and A. Stanco at Colstan regarding authorization for Bay Point to speak with broker regarding closing matters.	\$525.00	0.1	\$52.50
Non-billable Time Entries:								
09/05/2022	CS	ASSET DISPOSITION/SALES/LEASES/RENTALS	A103	L210	Begin drafting motion for authorization to enter into real property lease and motion for expedited hearing.	\$525.00	0.6	\$315.00
10/25/2022	CS	FINANCING	A112	L450	Travel from Dallas to New York for exit financing hearing and hearing prep.	\$525.00	3.5	\$1,837.50
Totals:							199.4	\$102,532.50

Expenses

Date	EE	Activity	UTBMS Expense Code	Description	Cost	Quantity	Line Total
06/27/2022	CS	FEE/EMPLOYMENT APPLICATIONS	E108	Mailing and first class mail postage of Simmons Legal PLLC retention application to parties on Debtor's service list.	\$59.32	1.0	\$59.32
06/29/2022	CS	BANKRUPTCY CASE ADMINISTRATION	E108	Mailing and postage for first class mail service of delivery of monthly operating report upon governmental taxing authorities of Debtor's service list.	\$9.76	1.0	\$9.76
07/22/2022	CS	BANKRUPTCY CASE ADMINISTRATION	E108	Mailing and postage for first class mail service of delivery of monthly operating report upon governmental taxing authorities of Debtor's service list.	\$8.58	1.0	\$8.58
07/22/2022	CS	BANKRUPTCY CASE ADMINISTRATION	E102	Printing at 10 cents per page for mailing of monthly operating report.	\$5.40	1.0	\$5.40
08/08/2022	CS	FEE/EMPLOYMENT APPLICATIONS	E102	Printing at 10 cents per page (750 pages) for mailing broker retention application and exclusivity motion to 30 addressees on service list.	\$75.00	1.0	\$75.00

08/08/2022	CS	FEE/EMPLOYMENT APPLICATIONS	E108	Mailing and first class mail postage of broker retention application and exclusivity motion to parties on Debtor's service list.	\$81.74	1.0	\$81.74
08/24/2022	CS	LITIGATION-MOTION TO DISMISS	E108	Overnight shipping cost for delivery of Exhibit binder to Court.	\$117.20	1.0	\$117.20
08/24/2022	CS	LITIGATION-MOTION TO DISMISS	E102	Printing for one set of Exhibits for Court's copy to be delivered by 8/25.	\$16.20	1.0	\$16.20
08/27/2022	CS	LITIGATION-MOTION TO DISMISS	E107	Shipping/delivery of hearing binders.	\$159.24	1.0	\$159.24
08/27/2022	CS	LITIGATION-MOTION TO DISMISS	E102	Printing and assembly of exhibit binders. [10 cents per page.]	\$262.17	1.0	\$262.17
08/28/2022	CS	LITIGATION-MOTION TO DISMISS	E110	Airfare to New York for depositions, hearing prep and hearing.	\$357.97	1.0	\$357.97
08/29/2022	CS	LITIGATION-MOTION TO DISMISS	E110	Hotel lodging expense (August 28 and August 29).	\$413.01	1.0	\$413.01
09/01/2022	CS	LITIGATION-MOTION TO DISMISS	E110	Rental car expense for travel to/from Southampton.	\$345.23	1.0	\$345.23
09/01/2022	CS	LITIGATION-MOTION TO DISMISS	E110	Airport parking fee.	\$80.00	1.0	\$80.00
09/21/2022	CS	Postage	E108	First class mail postage and mailing of August monthly operating report to taxing authorities.	\$8.68	1.0	\$8.68
09/23/2022	CS	FEE/EMPLOYMENT APPLICATIONS	E102	Printing at 10 cents per page (900 pages) for mailing Duane Morris LLP retention application and clarification and expedited hearing motions to 30 addressees on service list.	\$90.00	1.0	\$90.00
09/23/2022	CS	FEE/EMPLOYMENT APPLICATIONS	E108	Mailing and first class mail postage of Duane Morris LLP retention application and motion to clarify/reconsider Court's orders to parties on Debtor's service list.	\$92.20	1.0	\$92.20
10/01/2022	CS	FINANCING	E108	First class certified mail delivery of unsealed financing term sheet to U.S. Bankruptcy Court.	\$5.88	1.0	\$5.88
10/03/2022	CS	BANKRUPTCY CASE ADMINISTRATION	E107	Printing, mailing and postage charged by CertificateofService.com for first class mail service of exit financing motion, plan, disclosure statement and motion to seal on 32 addressees on service list.	\$382.18	1.0	\$382.18

10/12/2022	CS	BANKRUPTCY CASE ADMINISTRATION	E116	October 6 Hearing Transcript Fee.	\$175.45	1.0	\$175.45
10/17/2022	CS	FINANCING	E110	Airfare to New York for Oct. 26 hearing.	\$374.96	1.0	\$374.96
10/22/2022	CS	BANKRUPTCY CASE ADMINISTRATION	E108	Mailing and postage for first class mail service of delivery of monthly operating report upon governmental taxing authorities of Debtor's service list.	\$17.15	1.0	\$17.15
10/22/2022	CS	FINANCING	E107	Overnight shipping cost for delivery of Exhibit binder to Court.	\$153.88	1.0	\$153.88
10/27/2022	CS	FINANCING	E110	Airport parking fee.	\$48.00	1.0	\$48.00
10/27/2022	CS	FINANCING	E109	Rental car expense for travel to NY and Central Islip for hearing.	\$204.29	1.0	\$204.29
10/27/2022	CS	FINANCING	E110	Hotel fee for October 26 hearing.	\$457.66	1.0	\$457.66
10/28/2022	CS	FINANCING	E116	October 26 Hearing Transcript Fee (copy fee).	\$56.40	1.0	\$56.40
11/12/2022	CS	FINANCING	E108	Express 2 day mail delivery on motion to strike IRS tax liens to IRS Insolvency Unit in Philadelphia, Pennsylvania.	\$27.90	1.0	\$27.90
Non-billable Expenses:							
10/22/2022	CS	FINANCING	E102	Printing and assembly of exhibit binders. 10 cents per page.	\$255.69	1.0	\$255.69
10/22/2022	CS	FINANCING	E107	Shipping cost for delivery of Exhibit binders to Central Islip.	\$183.04	1.0	\$183.04

Expense Total: **\$4,085.45**

Time Entry Sub-Total:	\$102,532.50
Expense Sub-Total:	\$4,085.45
Sub-Total:	\$106,617.95
Total:	\$106,617.95
Amount Paid:	\$0.00
Balance Due:	\$106,617.95

Account Summary**Louise Blouin's Trust Balance**

Balance As Of 09/20/2022:
\$5,000.00

Exhibit D

Declaration/Certification

The undersigned hereby certifies that the undersigned has been designated by Simmons Legal PLLC as the Certifying Professional with respect to the Application, and that (a) the undersigned has read the Application; (b) to the best of the certifying professional's knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement sought is in conformity with the Guidelines for Fees and Disbursements for Professionals in Eastern District of New York Bankruptcy Cases, General Order 613, effective June 4, 2013; (c) the compensation and expense reimbursement requested are billed at rates in accordance with practices no less favorable than those customarily employed by Simmons Legal PLLC and generally accepted by Simmons Legal PLLC's clients.; (d) in providing a reimbursable service, Simmons Legal PLLC does not make a profit on the service, whether the service is performed by Simmons Legal PLLC in-house or through a third party.

The United States Trustee has been provided at least 21 days' notice of the Application before the proposed response deadline for the Application.

The undersigned certifying professional certifies under penalty of perjury that the information contained in the Application and the foregoing statements are true and correct to the best of her knowledge.

/s/ Camisha L. Simmons